# RCRA Part B Permit Renewal Review Checklists

US EPA RECORDS CENTER REGION 5

At the Portsmouth Gaseous Diffusion Plant, Piketon, Ohio

# RCRA Part B Review Checklist Section A Part A Application

#### PART B REVIEW CHECKLIST

#### **SECTION A - PART A APPLICATION**

Last updated: June 2006

Facility/ID #	ОН7890008983	Date	7/27/2010
Reviewer		DO	

Relevant Guidance Document: US EPA Form 8700-23 (Rev. March 2005) and instructions available at the following web address: <a href="http://www.epa.gov/osw/inforesources/data/form8700/8700-23.pdf">http://www.epa.gov/osw/inforesources/data/form8700/8700-23.pdf</a>

YES NO NA Page # Notes - NOD Comment # Include on Inspection Checklist? Contents of Part A of the permit application OAC 3745-50-41(D)(1)-(4), OAC 3745-50-43 (A), (B), (C), (D), (E) Does the application identify the activities conducted by the Х A-2 applicant which require the obtaining of a permit? Does the application identify the name, mailing address and Х location, including latitude and longitude, of the facility? A-1 Has the applicant supplied up to four industrial codes which best reflect the principle products or services provided by the X facility? (See http://www.naics.com/search.htm for appropriate A-1 codes) Does the application detail the owner and operator's name, Х address, telephone number, ownership status and status as A-1 federal, state, private, public or other entity?

,	ma sy'r	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
A - 1_	<u>List of Permits</u> - OAC 3745-50-41(D)(5), OAC 3745-50-43(K)(1)-(9)						
state	the application include a listing of all permits or approvals, or federal, received or applied for under any of the ving programs:						
(1)	hazardous waste management program under state or federal law?;	х			<b>A-</b> 5		
(2)	underground injection control (UIC) program under the Solid Waste Disposal Act?;			х			
(3)	national pollutant discharge elimination system (NPDES) program under the Clean Water Act (CWA)?;	х		:	A-5		
(4)	prevention of significant deterioration (PSD) program under the Clean Air Act (CAA)?;			х			
(5)	nonattainment program under the CAA?;			х			
(6)	national emission standards for hazardous air pollutants (NESHAP) preconstruction approval under the CAA?;	х			A-5		
(7)	ocean dumping permits under the Marine Protection Research and Sanctuaries Act?;			х			
(8)	dredge or fill permits under section 404 of the CWA?;			Х			
(9)	other relevant environmental permits, including state permits?	х			A-5		

,		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
A - 2_	<u>Topographic Map</u> - OAC 3745-50-41(D)(6), OAC 3745-50-43(L)(1)-(4)						
	the application include a topographic map (or other map if graphic map is unavailable) with the following criteria:						
(1)	extending one mile beyond the property boundaries of the facility or activity?;	х			FIG. A-1		
(2)	depicting the facility and each of its intake and discharge structures?;	х			FIG. A-1		
(3)	depicting each of its hazardous waste treatment, storage and disposal facilities?;	х			FIG. A-1		
(4)	depicting each well where fluids from the facility are injected underground?;			х			
(5)	depicting those wells, springs, other surface water bodies, and drinking water wells listed in public records or otherwise known to the applicant within one quarter mile of the facility property boundary?	х			FIG. A-1		
A - 3_	Nature of Business - OAC 3745-50-41(D)(7), OAC 3745-50-43 (M)				-		•
	the application include a brief description of the nature of siness?	х			A-5		
A - 4	Application Status - OAC 3745-50-43 (G)		<del></del>		·		
	ne application included an indication of whether the facility and whether it is an initial or revised permit application?	х			A-1	_	

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
A - 5	Facility Drawing - OAC 3745-50-43 (H)(1)						
drawir	tisting facilities, does the application include a scale ng of the facility showing the location of all past, present ture treatment, storage, and disposal areas?	х			A-19		
A - 6	Facility Photographs - OAC 3745-50-43 (H)(2)						
deline and di	the application include photographs of the facility clearly ating all existing structures; existing treatment, storage, isposal areas; sites of future treatment, storage, and sal areas?	х			A-20		
A - 7	Process Description and Design Capacities OAC 3745-50-43 (I)						
used f	the application include a description of each process to be for treating, storing and disposing of hazardous waste, and esign capacity of each unit?	х			A-7		
A-8	Hazardous Waste Specifications OAC 3745-50-43 (J)						•
Does	the application include:						
(1)	a specification of the hazardous wastes listed or designated under Chapter 3745-51 of the OAC to be treated, stored, or disposed at the facility?	х			A-9 THRU A-15		
(2)	an estimate of the quantity of such wastes to be treated, stored, or disposed annually, and the processes to be used for such wastes?	х			A-7		

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
A - 9 <u>Description of Debris and Contaminant Categories</u> OAC 3745-50-43 (N)						
Does the application include a description of the debris category(ies) and the contaminant category(ies) to be treated, stored, or disposed at the facility?	х			C-2		
A - 10 <u>All Other Information</u> OAC 3745-50-43 (O)						
Does the application include all other information required by U.S. EPA form 8700-23?	х			MULTIPLE PAGES		
Additional Reviewer Notes:						
Has the owner/operator signed and dated the Part A application with the certification language of OAC 3745-50-42 (D)?  Note: Every time the Part A form is changed, it should be recertified by the owner/operator.	х			A-4		
Does the Part A application include proper units of measure or properly applied unit conversions?	х			A-6		
Are the waste codes/volumes listed in the Part A application consistent with the those listed in the other parts of the application?	х			A-9 THRU A-15		

# RCRA Part B Review Checklist

**Section B** 

**Facility Description** 

#### PART B REVIEW CHECKLIST

### SECTION B - FACILITY DESCRIPTION Last updated: February 2005

Facility/ID #	ОН7890008983	Date	7/27/2010
Reviewer		DO	

Relevant Guidance Documents: None

	•	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
B-1	General Description OAC 3745-50-44 (A)(1)						
includ identif briefly	the application include a brief description of the facility ing the nature of the business? Off-site facilities should by the types of industries served; on-site facilities should describe the process(es) involved in the generation of dous waste.	х			B-1		
B-2a	Traffic Information OAC 3745-50-44 (A)(10)						
Is the	re a description of traffic patterns including:						
(1)	Traffic patterns on-site?;	Х			B-3		
(2)	Estimated volume (e.g. number and type of vehicles)?;	х			B-12		
(3)	Traffic control (e.g. turns across traffic lanes, procedures)?;	х			B-4		
(4)	Access road surfacing?;	Х			B-3		
(5)	Access load-bearing capacity?; and	Х			B-4		
(6)	Traffic control signals?	х			B-4		

		YES	NO	NA	Page #	Notes - NOD Comment#	Include on Inspection Checklist?
B-2b Seismic Co OAC 3745-	onsiderations -54-18(A)						
treatment, storage conducted shall no	ted that portions of the facility where , or disposal of hazardous waste will be of be located within sixty-one meters (two fault which has had displacement in Holocene			х	B-3		
	<u>Information</u> -50-44 (A)(11), OAC 3745-54-18(B)						
facility is in a one-lindicate the source copy of the relevar map, if used, or the map is not available NOTE: Where FIA location, the owner techniques to dete hundred-year flood	ains, did the facility determine whether the nundred year flood-plain. Did the facility of data for such determination and include a not federal insurance administration (FIA) flood to calculations and maps used where an FIA de?  maps are not available for a proposed facility or or operator must use equivalent mapping remine whether the facility is within the one-delevation would be.	Х			B-3		
If the facility is with	nin a flood plain, did they:						
hydrodynai	engineering analysis to indicate the various mic and hydrostatic forces expected to result quence of a one-hundred—year flood?;			х			
(2) Show how	units are designed to prevent washout?			Х			
provide a plan for	(1) and (2) of B-3a above, did the facility removing the hazardous waste to a safe e occurrence of a flood, including:						

,		YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
(1)	Timing of waste removal relative to flood levels?;			Х			
(2)	A description of the location where the waste will be kept, including a demonstration that the receiving facility are eligible to receive the waste?;			х			
(3)	Procedures and equipment to be used when moving the waste and assurances that the necessary equipment will be available?;			х			
(4)	A discussion of the potential for spill during waste movement; or, for existing surface impoundments, waste piles, land treatment units, landfills, and miscellaneous units, the facility has demonstrated that no adverse effects on human health or the environment will result if washout occurs, considering:						
	<ul> <li>a) The volume and physical and chemical characteristics of the waste in the facility?;</li> </ul>			х			
	<ul> <li>b) The concentration of hazardous constituents that would potentially affect surface waters as a result of washout?;</li> </ul>			х			
	c) The impact of such concentrations on the current or potential uses of and water quality standards established for the affected surface water?; and			х			
	d) The impact of hazardous constituents on the sediments of affected surface waters or the soils of the one- hundred-year floodplain that could result from washout? [OAC 3745-54-18 (B)(1)(b)(i-iv)]			х			

		YES	NO	NA	Page#	Notes - NOD Comment #	Include on Inspection Checklist?
	facility was in operation prior to October 9, 1980, is it in iance with OAC 3745-54-18 (B)?			x			
be bro	has the facility provided a plan showing how the facility will bught into compliance, including a schedule for iance?						
B-3	Certain Waste Placement Prohibitions OAC 3745-54-18 (C)						
liquid forma	e facility propose to place any noncontainerized or bulk hazardous waste in any salt dome formation, salt bed tion, underground mine, or cave? This type of wastement is prohibited.			х			
B-4	Topographic Map OAC 3745-50-44 (A)(19)						
Did th	e facility submit a topographic map that:						
(1)	Shows a distance of one thousand feet around the facility?;	х			FIG.B-2		
(2)	Has a scale of one inch to not more than 200 feet?;	х				FIG. B-3 Through FIG. B-6	
(3)	Has contours appropriate to the relief at the facility?;	Х			FIG. B-2		
(4)	Has contours that are sufficient to clearly show the pattern of surface water flow in the vicinity of and from each operational unit at the facility?;	х			FIG. B-2		
(5)	Shows map scale and date?;	х			FIG. B-2		
(6)	Shows the one hundred year floodplain area?;	х			FIG. B-2		
(7)	Shows surface water bodies in the immediate area?;	х			FIG. B-2		

		YES	NO.	NA	Page #	Notes - NOD Comment#	Include on Inspection Checklist?
(8)	Shows surrounding land uses?;	Х			FIG. B-2		
(9)	Includes a wind rose?;	Х			FIG. B-2		
(10)	Has a north arrow?;	х			FIG. B-2		
(11)	Shows the legal boundaries of the facility?;	Х			FIG. B-2		
(12)	Shows access control (e.g. fences, gates, etc.)?;	Х			FIG. B-2		
(13)	Shows injection and withdrawal wells both on-site and off-site?;	х			FIG. A-1		
(14)	Shows buildings; treatment, storage, or disposal operations?;	х	i		FIG. B-2		
(15)	Shows other structures, (e.g. recreation areas, run-off control systems, sewers, loading areas, access and internal roads, fire control facilities, etc.)?;	х			FIG. B-2		
(16)	Shows barriers for drainage or flood control?;	Х			FIG. B-2		
(17)	Shows location of operational units for treatment, storage, or disposal of hazardous waste.	х			FIG. B-2		
other requir	E TO REVIEWER: The facility may need to submit maps than a topographic map to meet the information ements listed above. The facility should also submit a g map, a FEMA floodplain map, and a small scale map of cility)						

# RCRA Part B Review Checklist

Section C

Waste Characteristics

#### **PART B REVIEW CHECKLIST**

## SECTION C - WASTE CHARACTERISTICS Last updated: May 2005

Facility/ID #	ОН7890008983	Date	7/28/2010
Reviewer		DO	

Relevant Guidance Documents - Waste Analysis Plan Guidance - OEPA/DHWM (final - 6/2000); Federal Waste Analysis guidance manual (4/1994)

	YEŞ	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
C-1 <u>Chemical and Physical analyses:</u> OAC 3745-50-44 (A)(2), 3745-54-13						
Before hazardous waste is stored, treated or disposed at the facility, are there procedures in place to describe the waste, identify the hazard characteristics, and give the basis for hazard designation?	х			C-1		
Does the Waste Analysis Plan (WAP) contain a complete description of the chemical and physical analyses of representative samples of waste?	Х			TABLE C-2		_

	YES	NO	NA	. Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the chemical and physical analysis of representative samples include at least one of the following:  (a) the facility's records of analyses performed on the waste; or  (b) studies conducted on hazardous waste generated from processes similar to that which generated the waste to be managed at the facility; or  (c) information supplied by the generator of the hazardous waste?  If the facility does not use any of the above as part of the information needed to treat, store or dispose of the waste, then the owner or operator is responsible for conducting the chemical and physical analysis of representative samples of the waste before the waste can be accepted at the facility.	x			C-1		
Does the analysis of representative samples contain all of the information that is necessary to treat, store, or dispose of the waste in accordance with Ohio regulations and terms and conditions of an Ohio hazardous waste permit?  NOTE: The analysis may include data developed under OAC Chapter 3745-51 and existing published or documented data on the hazardous waste or hazardous waste generated from similar processes.	х			C-1		
Are all wastes listed in the part A permit addressed in the WAP?	х				TABLE C-2	

C-1a <u>Containerized Waste:</u> OAC 3745-50-44 (C)(1)(b)(i)

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Do owners and operators that store containers of wastes in storage areas without secondary containment systems provide the test procedures and results, or other documentation or information, which show that the wastes do not contain free liquids?			х			
Do owners and operators that store containers of wastes in storage areas with impermeable coating demonstrate that waste analysis will be performed to ensure that the waste is compatible with the coating material?	х			C-9		
C-1b Waste in Tank Systems: OAC 3745-55-91 (B)(2), 3745-55-92 (A)(2)						
Are the wastes placed for storage or treatment in tanks compatible with the tank materials (including, gaskets, valves, welds, etc.)?			х			
If there is the potential for incompatibility are screening tests described in the WAP (e.g., pH, corrosivity, gas generation, etc.)?			х			
C-1c Landfilled Wastes: OAC 3745-57-14 (B)						
Does the WAP provide the results from the Paint Filter Liquids Test (Method 9095 in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Method," EPA Publication No. SW-846) showing that containerized or bulk wastes to be placed in a landfill do not contain free liquids?			х			
C-1d Wastes Incinerated and Wastes Used in Performance Tests: OAC 3745-50-44 (C)(7)(c)(i), (iii),(vii), and (viii)	•		•			•

		YES	NO.	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
	applicant opts to not conduct a trial burn, are analyses led for each waste or waste mixture to be burned including:						
in "Te	E: The analysis must rely on analytical techniques specified st Methods for Evaluating Solid Waste, Physical/Chemical ods" (EPA SW-846) or its equivalent.						
(1)	heat value of the waste in the form it will be burned?;			Х			
(2)	viscosity of liquids or description of the physical form of non-liquids?;			х			
(3)	identification of any Appendix to OAC 3745-51-11 hazardous constituents reasonably expected to be present?;			х			
(4)	identification of and the basis for exclusion from analysis those constituents that are not expected to be present?;			Х			
(5)	an approximate quantification of hazardous constituents in the waste, including those that may be POHCs based on data from other trial or operational burns?			х			
neede burne noting	a is necessary to support the claim that a trial burn is not ed, are analyses provided that compare the waste to be d with data from wastes burned in operational or trial burns, g POHCs identified in the waste and any differences from OHCs in the waste for which burn data are provided?			х			
const	vaste analysis data be submitted that is sufficient to allow ituents (for which destruction and removal efficiencies will be red) the specification as permit POHCs?			х			
C-1e	Wastes to be Land Treated: OAC 3745-50-44 (C)(5)(d)			•			

OAC 3745-50-44 (C)(5)(d)

Page 5						
	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
If food-chain crops are to be grown in or on the treatment zone of a land treatment unit, does the WAP include a description of how the demonstration required under paragraph (A) of OAC Rule 3745-56-76 will be conducted?  This demonstration must include the characteristics of the food-			х			
chain crop; the characteristics of the waste, treatment zone, and waste application method and rate to be used in the demonstration; procedures for crop growth, sample collection, sample analysis, and data evaluation; and the characteristics of the comparison crop including the location and conditions under which it was or will be grown.						
C-1f Waste in Miscellaneous Treatment Units: OAC 3745-50-44 (C)(8)(d)						
For any miscellaneous unit treating hazardous waste, does the WAP provide a report on a demonstration of the effectiveness of the treatment based on laboratory or field data?			х			
C-1g(1) Waste in Boilers and Industrial Furnaces: Waiver of trial burn for destruction and removal efficiency (DRE) OAC 3745-50-44 (C)(9)(a)(ii)						
For a facility seeking to be permitted under the provisions for low risk waste provided by OAC 3745-266-104(A)(5) and 3745-266-109(A) in order to waive the destruction and removal efficiency (DRE) trial burn, are analyses provided for each waste or waste mixture to be burned including:						
NOTE: The analysis must rely on analytical techniques specified in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA SW-846) or its equivalent.						

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,		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(1)	Identification of any nonmetal compounds listed in the Appendix to OAC 3745-51-11, except for those hazardous constituents reasonably not expected to be present?;			х			
(2)	Waste analysis that provides documentation of hazardous waste firing rates and calculations of reasonable, worst-case emission rates of each constituent identified and results of emissions dispersion modeling for these worst-case emission rates?			х			
(3)	Waste analysis that provides documentation of hazardous waste firing rates and calculations of reasonable, worst-case emission rates of each constituent identified and results of emissions dispersion modeling for these worst-case emission rates?			х			
(4)	Waste analysis that provides documentation that the maximum annual average ground level concentration of each identified constituent does not exceed the allowable ambient level established in appendix I or II of OAC 3745-266-109?			х			
C-1g(2	) <u>Waste in Boilers and Industrial Furnaces:</u> Waiver of trial burn for metals OAC 3745-50-44 (C)(9)(a)(iii)						
WAP in	acility seeking a waiver of the trial burn for metals, does the notude the proposed sampling and metals analyses plan by			Х			

raye /	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
C-1g(3) Waste in Boilers and Industrial Furnaces: Waiver of trial burn for particulate matter OAC 3745-50-44 (C)(9)(a)(iv)						
For a facility seeking to be permitted under the low risk waste provisions of OAC 3745-266-109(B) which waives the particulate standard (and trial burn to demonstrate conformance with the particulate standard), did the facility provide the same waste analyses that are required for facilities seeking a waiver of trial burn for destruction and removal efficiency (as stated above in C-1g(1))?			х			
C-1g(4) Waste in Boilers and Industrial Furnaces: Waiver of trial burn for hydrogen chloride and chlorine gas OAC 3745-50-44 (C)(9)(a)(v)						
For a facility seeking a waiver of the trial burn for hydrogen chloride and chlorine gas, are analyses provided for each waste or waste mixture to be burned that provides the levels of total chloride and chlorine in the hazardous waste, other fuels, and industrial furnace feedstocks, and calculations of the total feed rate of total chloride and chlorine?			х			
C-1g(5) Waste in Boilers and Industrial Furnaces:  Data in lieu of trial bum  OAC 3745-50-44 (C)(9)(a)(vi)	-					
If a facility seeking an exemption from the trial burn requirements by providing information from previous compliance testing or trial or operational burns of similar boilers or industrial furnaces burning similar hazardous wastes under similar conditions, has the facility provided in the WAP:						

Pa	ae	8
_	ue	0

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(1)	A description and analysis of the hazardous waste to be burned compared with the hazardous waste for which data from previous compliance testing or trial or operational burns to support the contention that a trial burn is not needed?			х			
(2)	For a waiver of the DRE trial burn, the basis for selection of POHCs used in the other trial or operational burns which demonstrate compliance with the DRE performance standard in OAC 3745-266-104(A)? Does this analysis specify the constituents in the appendix to OAC 3745-51-11 that the applicant has identified in the hazardous waste for which a permit is sought and any differences from the POHCs in the hazardous waste for which previous burn data are provided?			х			
C-1g(6)	Waste in Boilers and Industrial Furnaces: Residues OAC 3745-50-44 (C)(9)(f)						
from reg	wher or operator claims that their residues are excluded gulation under OAC 3745-266-112, did they include waste a procedures for demonstrating that the residues are d from regulation?			х			
C-2	Waste Analysis Plan: OAC 3745-50-44 (A)(3), 3745-54-13 (A), (B) & (C)						
that des	facility provided a copy of the waste analysis plan (WAP) scribes the methodologies for conducting the analyses to properly treat, store, or dispose of hazardous wastes comply with the land disposal restriction program?	х			C-4		

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
be con	ticipated the following facility description information would tained in other sections of the part B application, however if AP is a stand alone document, it should be included:						
(1)	As part of the waste profiling process, are brief descriptions of off-site hazardous waste generating processes obtained, updated, and kept at the facility as part of the operating record?			х			
(2)	Are all hazardous wastes generated or managed at the facility adequately described, including identity of hazardous waste, approximate quantities managed, process generating the waste, rationale for identifying the waste as hazardous, and other appropriate Ohio EPA waste classifications?			Х			
C-2a	Parameters and Rationale: OAC 3745-54-13(B)(1)						
Does t	he WAP list parameters chosen for analysis?	Х				TABLE C-2	
(e.g. fla	rameters for determining if a waste is hazardous or not ash point at 140 degrees, pH > 12.5 < 2, etc.) listed for aste stream managed?	Х				TABLE C-2	
physica	ere parameters used to ensure that wastes are within all and chemical operating and permit acceptance limits of ste management units (e.g. corrosives in steel tanks or ners)?	Х			D-1		
	tential changes in waste characteristics accounted for in all s of the treatment process?			х			
Are rat	ionales provided for each parameter selected?	Х				TABLE C-2	

Page	10
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	YES	МО	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Are sampling, analytical, and procedural methods to identify ignitable, incompatible, and reactive wastes provided (this would include for the purposes of storage, handling, treatment and disposal)?	х			C-9		
Does the WAP describe the parameters and rationale for testing waste before treatment to ensure the appropriateness of that treatment?			х			
Does the WAP describe the parameters and rationale for testing waste after treatment to make sure it was effective?			х			
Some listed wastes are listed for additional hazards besides toxicity (for example U223 is listed for reactivity as well as toxicity, will the facility screen for reactivity as well). The facility may need to determine if the additional hazard codes apply. Do listed wastes have more than one waste hazard that need to be analyzed for and, therefore, are the appropriate parameters selected for these wastes?			х			
C-2b <u>Test Methods:</u> OAC 3745-54-13(B)(2)						
Does the WAP identify and reference (e.g., EPA Test No.) the test methods used to test for parameters chosen?	х			C-5		
Are the analytical methods approved methods, as found in SW-846 or ASTM standards?	х			C-5		
Are modifications to the approved methods or alternate methods fully described in the permit application and is the modified or alternate method equivalent to an approved method?	х			C-5		
Does the WAP specify if the laboratory used is an on-site or off- site laboratory?	х			C-5		

Page	1	1

age i		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
they st	permittee indicates they will use an off site laboratory do tate in the WAP they will ensure that the off site laboratory ize the methods (SW-846 or equivalent method) in the WAP including all QA/QC procedures?	Х			C-5		
with S	he WAP include a quality assurance plan in accordance W-846 chapter one or other appropriate guidance that es the following:						
(1)	A statement of project objectives?	Х			C-16		
(2)	Assurance that the detection limits are in accordance with SW-846 methods or methods approved under the WAP?	х			C-16		
(3)	A description of handling and storage of sampling and analysis records (including custody procedures for shipping to other labs)? A statement must be in the WAP that these records will be part of the facility operating record.	х			C-17		
(4)	A description of organizational structure, functional responsibilities, and lines of communications for the facility's lab personnel? This should describe who is responsible for QA and how others report to him/her (this should include who is responsible for QA of off-site labs as well).	х			C-16		
(5)	A description of the training required for those involved in QA/QC located in the application (this may also be covered in section H of the application)?	х			C-16		
(6)	A description of performance evaluation? The WAP should define how often this will occur, and what will be done if problems are found.	Х			C-16		

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Page 12		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(7)	A description of how QA/QC will be ensured for field activities? The WAP must specify that this will include the checks on the completeness of field reports, validation of sampling methods, and determination of representativeness. The WAP must also specify how often these activities will occur.	х			C-16		
(8)	A description of how QA/QC will be ensured for lab activities? Does the WAP specify that the following will occur at a specified time frame;						
	a) a check for completeness of records?;	Х			C-17		
	<ul> <li>evaluation of data with respect to detection and quantitation limits?;</li> </ul>	х			C-17		
	c) evaluation of data with respect to control limits?;	Х			C-17		
	d) review of holding time data?;	Х			C-17		
	e) correlation of lab data with related tests?;	X			C-17		
	f) calibration of instruments?;	Х			C-17		
(9)	A description of QA reports? The WAP must specify how often these are generated, that they will report on measurement quality indicators, QA assessments, including defined operating standards. The WAP must also specify who will be responsible and how and what corrective action will be taken.	х			C-17		
(10)	Are quality control methods presented, including analysis of method blanks, matrix spikes, surrogate spikes, and duplicate samples which are used to measure laboratory precision and accuracy?	х			C-16		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Are analytical methods for each parameter to be analyzed specified?	х			C-5		
C-2c Sampling Methods: OAC 3745-54-13 (B)(3) and SW-846 Chapter 9						
Does the WAP identify and reference (e.g., ASTM) the sampling methods used to obtain a representative sample (exhibits average properties of the whole waste) of each waste to be analyzed and document that the chosen method is appropriate for the type and nature of the waste? Does this include selection of the appropriate type of equipment for the waste?	х			C-5		
Are sampling methods used from Appendix I of OAC 3745-51-20 (most recent version), or are they approved equivalent method?	х			C-5		
Is there a clearly defined sampling approach that includes:						
(1) the objectives of sampling?;	Х			C-16		
(2) types of samples needed?;	х			C-16		
(3) sampling locations?;	х			C-16		
(4) number of samples?;	Х			C-16		
(5) sampling frequency?;	Х			C-16		
(6) collection techniques?; and	х			C-5		
(7) and handling techniques?	Х			C-16		
Is the sampling equipment to be used to collect each sample clearly identified as well as the procedure to use that equipment?	х			C-6		

Page 14	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Is the sampling equipment chosen appropriate based on criteria of physical parameters, chemical parameters, and waste-specific or site specific factors?	х	:		C-5		
Are appropriate maintenance and decontamination procedures specified for each piece of sampling equipment?	х			C-17		
Are field calibration procedures for sampling equipment specified (as applicable)?	х			C-17		
Are samples properly preserved and stored in accordance with SW-846?	х			C-17		
Are holding times specified for each sample?	Х			C-17		
Are appropriate sample containers used?	Х			C-17		
Does the WAP describe a method for documenting and justifying deviations from the WAP?	х			C-17		
Are QC measures to be taken clearly identified?	х			C-16		
Are QC procedures identified adequate to measure attainment of QA objectives, including use of field blanks, trip blanks, equipment blanks, split samples, and field duplicates?	х		•	C-16		
Are proper chain of custody procedures to be followed identified?	Х			C-17		
Is adequate sample information collected and recorded, including type of waste collected, names and signatures of samplers, sample number, site map (if needed),date and time of collection, designation as grab or composite, names and signatures of any persons handling the samples, and the shipping number if sample are sent to an off-site laboratory (does the facility include the form in the WAP)?	х			C-16		

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Page	1	5

Page 15	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Are health and safety protocols clearly identified?	х			C-16		
Does section H include training requirements for personnel collecting samples?	х			C-16		
C-2d <u>Frequency of Analyses:</u> OAC 3745-54-13 (A)(3) & (B)(4)						
Does the WAP describe the frequency at which the analyses will be repeated for each waste stream?	х			C-6		
Are wastes re-evaluated when waste generating processes are changed?	х			C-7		
Are wastes re-evaluated when wastes characterized by the TSDF do not match the pre-approved waste analysis or manifest?	х			C-7		
Are waste re-evaluation frequencies adequate to ensure compliance with permit conditions and other regulatory requirements?	х			C-7		
For incineration facilities, is waste analyzed prior to burning each batch to verify that the permit conditions will be met and that prohibited constituents (e.g. PCBS, dioxins, reactive wastes) and other specific constituents are not present (see page 2-48, 4/94 federal WAP guidance)?			х			
C-2e Additional Requirements for Wastes Generated Off-Site: OAC 3745-54-13 (B)(5) & (C)						
Does the WAP describe the procedures for inspecting and/or analyzing a representative portion of each hazardous waste received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper?	х			C-7		

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,	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Are statistical methods used to determine a representative sample of the incoming wastes (e.g., number of drums to be sampled) described?	Х			C-7		
Is there a statement in the WAP that describes the minimum amount of waste to be sampled (eg. no less than 10 percent of containers for an incoming waste stream)?	Х			C-7		
Is the waste analysis data that the generator agrees to provide specified?	Х			C-8		
Are procedures to determine how well the generators data represents the waste to be managed provided?	х			C-8		
Are procedures to handle wastes which are significantly different than waste characterized previously specified?	х			C-8		
Is the method used to identify each movement of hazardous waste at the facility specified (examples include bar code tracking, inventory sheets, etc.)?	х			C-8		
If fingerprint analysis is used, are methods used for obtaining a representative sample provided?	х			C-5		
If fingerprint analysis is used, are parameters each waste will be analyzed for, rationale for parameters selected, and acceptance and rejection criteria for each parameter specified?	х			C-4		
Are there procedures in place to determine if a biodegradable sorbent has been added to the waste in containers?			х			

C-2f Additional Requirements for Ignitable, Reactive or Incompatible Wastes: OAC 3745-54-13 (B)(6), 3745-54-17

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· · ·	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the facility define what is incompatible (e.g. storing acids and organic ignitables, etc)?	х			C-9	REFERENCES SECTION D-1A(3)	
Does the WAP describe the methods used to meet additional waste analysis requirements necessary for treating, storing, or disposing of ignitable, reactive or incompatible wastes?	x			C-9		:
Are procedures in place to identify ignitable, reactive, or incompatible wastes and are those SOPs included in the WAP?	х			C-9		
If testing is used, are testing or analytical methods provided for ignitable, reactive or incompatible wastes?	х			C-9		
C-3 Waste Analysis Requirements Pertaining to Land Disposal Restrictions:						
C-3a Applicability of Treatment Standards: OAC 3745-270-40						
Does the facility document that restricted wastes, hazardous debris, and/or contaminated soils will not be land disposed unless they meet the applicable treatment standards identified in OAC 3745-270-40 to 49?	х			C-9		
'C-3a(1) Waste Characterization: OAC 3745-54-13 (A)			•	•		
For each hazardous waste stored, treated, or disposed at the facility, does the facility obtain analytical data necessary to determine if the waste is a restricted waste in accordance with OAC Chapter 3745-270? Alternatively, is information provided from knowledge of the waste to determine if the waste is restricted?	x			C-10		
Where generator knowledge is used to make this determination, does the WAP specify that all supporting data will be maintained in the operating record?	х			C-11		

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Page 18							
		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
C-3b	Prohibitions: OAC 3745-270-03 and OAC 3745-270-30 three	ough 39					
C-3b(1	Dilution Prohibited As A Substitute For Treatment: OAC 37	45-270-0	)3				
method	ne WAP specify that the facility will NOT use dilution as a lift to treat wastes and treatment residues that are restricted and disposal except in the following circumstances:	Х			C-10		
	that are hazardous only because they exhibit a teristic in treatment systems (including land based units):  which discharge to waters of the United states pursuant to a Clean Water Act (CWA) discharge permit, or	х			C-10		
2)	Wastes that are treated in CWA equivalent system, or			х			
3) UNLES	Wastes treated in pre-treatment systems as defined by section 307 of the CWA.			х			
a)	The waste is a D003, reactive, cyanide wastewater or non-wastewater, or			х			
b)	A method other than DEACT has been specified in OAC 2745-270-40 as a treatment standard.			х			
C-3b(2	): Wastes That Are Prohibited From Combustion: OAC	2745-27	0-03(C)				
the Ap	ne WAP document that combustion of the wastes listed in pendix to OAC 2745-270-03 is prohibited unless the waste the following criteria at the point of generation or after bona atment:			х			
1)	The waste contains hazardous organic constituents or cyanide at levels exceeding the constituent specific treatment standard in OAC 3745-270-48, or			х			

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
2)	The waste consists of organic debris-like materials contaminated with an inorganic metal-bearing hazardous waste, or			х			
3)	The waste at the point of generation has reasonable heating value such as greater than or equal to 5,000 Btu per pound, or			х			
4)	The waste is co-generated with wastes for which combustion is a required method of treatment, or			х			
5)	The waste is subject to federal and/or state requirement necessitating reduction of organics (including biological agents), or			х			
6)	The waste contains greater than 1% of total organic carbon.			х			
C-3b(3	) <u>Dilution Prohibition for Lead Containing Wastes: OAC 374</u>	5-270-03	(D)	<u> </u>	<u> </u>		
forms of LDR tro D008 v underly	the WAP document that adding iron filings or other metallic of iron to lead-containing hazardous wastes to achieve any eatment standard is prohibited? NOTE: This includes wastes, all characteristic wastes containing lead as an ying constituent, and hazardous media containing any of rementioned lead-containing wastes.			х			
C-3b(4	) Waste Specific Prohibitions: Wood Preserving Wastes: O.	AC 3745-	-270-30				
presen and F0	he facility document that F032, F034, and F035 wood ving wastes, soil and debris contaminated with F032, F034, 35 wastes, and F032, F034, and F035 mixed with ctive mixed wastes are prohibited from land disposal						

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		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(1)	the wastes meet the treatment standards in OAC 3745-270 40 through 49, or			Х			
(2)	an exemption has been granted pursuant to OAC 3745-270-06, or			х			
(3)	the wastes meet the applicable alternate treatment standard established pursuant to a petition granted under OAC 3745-270-44, or			x			
(4)	a case-by-case extension has been granted pursuant to OAC 3745-270-05?			х			
treatme	e determination of whether the wastes meet or exceed the ent standard been made by either lab analysis or generator dge? OAC 3745-270-30(E)			х			
C-3b(5)	Waste Specific Prohibitions: Dioxin-containing wastes: C	AC 3745	-270-31				
	ne facility document that F020, F021, F022, F023, F026, and F028 wastes are prohibited from land disposal unless:						
(1)	the F020 to F023 and F026 to F028 wastes are soil and debris from a response action taken under section 104 or 106 of CERCLA, or			х			:
(2)	the F020 to F023 and F026 to F028 wastes are soil and debris from a response action taken under Subtitle C of RCRA, or	ī		х			
(3)	the wastes meet the standards of OAC 3745-270-40 to 49, or	х			C-10		
(4)	an exemption has been granted under OAC 3745-270- 06, or			х			

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,		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(5)	a case-by-case extension has been granted pursuant to OAC 3745-270-05?			х			
C-3b(6)	Waste Specific Prohibitions: chlorinated aliphatic wastes:	OAC 37	45-270-	33			
debris o	e facility document that K174 and K175 wastes, soil and contaminated with these wastes, radioactive wastes mixed se wastes, and soil and debris contaminated with tive wastes mixed with these wastes are prohibited from posal?						
These v	vastes are not prohibited from land disposal if:						
(1)	the wastes meet the treatment standards in OAC 3745-270 40 through 49, or			х			
(2)	an exemption has been granted pursuant to OAC 3745-270-06, or			х			
(3)	the wastes meet the applicable alternate treatment standard established pursuant to a petition granted under OAC 3745-270-44, or			х			
(4)	hazardous debris has met the treatment standards in rule 3745-270-40 or alternative treatment standards in rule 3745-270-45, or			х			
(5)	a case-by-case extension has been granted pursuant to OAC 3745-270-05?			х			
treatme	determination of whether the wastes meet or exceed the nt standard been made by either lab analysis or generator lge? OAC 3745-270-33(C)			х			

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		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
compli macro 3745-2	the WAP state that disposal of K175 wastes that have ed with all applicable treatment standards must also be encapsulated in accordance with the table in OAC rule 170-40?  Taste does not have to be macroencapsulated if it is placed						
(1)	a permitted hazardous waste landfill containing only K175 wastes that meet all applicable treatment standards, or			х			
(2)	A dedicated permitted hazardous waste landfill cell in which all other wastes being co-disposed are at pH 6.0?			х			

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age .		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does	s the facility document or state that the following wastes:						
(1)	D004 to D0011 wastes, soil, or debris identified as hazardous by TCLP, but not the extraction procedure;	,					
(2)	waste, soil or debris from mineral processing operations identified as hazardous by OAC 3645-51;						
(3)	slag from secondary lead smelting which exhibits the toxicity characteristic for one or more metals;						
(4)	and radioactive wastes mixed with D004 to D011 wastes; or characteristic waste, soil, or debris from mineral processing operations;	х			C-10		
(5)	newly identified characteristic wastes from elemental phosphorus processing		<u> </u>				
are p	orohibited from land disposal?		ļ		:		
The	above wastes are not prohibited from land disposal if:						
(1)	the wastes meet the applicable treatment standards of OAC 3745-270-40 to 49, or	х			C-10		
(2)	an exemption has been granted under OAC 3745-270-06, or			х			
(3)	The wastes meet the applicable alternate treatment standards established pursuant to a petition granted under OAC 3745-270-44, or			х			
(4)	a case-by-case extension has been granted pursuant to OAC 3745-270-05?			х			

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YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
х			C-10		
OAC 3	745-270	-35			
		х			
		х			
		х			
		х			
	i _	х			
		х			
	x	х	X OAC 3745-270-35  X X  X X  X X	X C-10  OAC 3745-270-35  X  X  X  X  X  X  X  X  X	X C-10  OAC 3745-270-35  X  X  X  X  X  X  X  X  X  X

Page	2	5

,		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
debr with radio	is the facility document that K174 and K175 wastes, soil and is contaminated with these wastes, radioactive wastes mixed these wastes, and soil and debris contaminated with sactive wastes mixed with these wastes are prohibited from disposal?						
Thes	se wastes are not prohibited from land disposal if:					***	
(1)	the wastes meet the treatment standards in OAC 3745-270 40 through 49, or			х			
(2)	an exemption has been granted pursuant to OAC 3745-270-06, or			х			
(3)	the wastes meet the applicable alternate treatment standards established pursuant to a petition granted under OAC 3745-270-44, or			х			
(4)	hazardous debris has met the treatment standards in rule 3745-270-40 or alternative treatment standards in rule 3745-270-45, or			х			
(5)	a case-by-case extension has been granted pursuant to OAC 3745-270-05?			х			
treat	the determination of whether the wastes meet or exceed the ment standard been made by either lab analysis or generator wledge? OAC 3745-270-33(C)			х			
C-3b	(10) Waste Specific Prohibitions: Wastes with ignitable and	corrosive	charac	teristics	OAC 37	45-270-37	
as s <sub>i</sub> liquid	s the facility document or state that the following D001 wastes pecified in OAC 3745-51-21 (but not in the high TOC ignitable its subcategory), and D002 wastes as specified in OAC 3745-2 are prohibited from land disposal:						

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, .		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
	whose discharge is not regulated by the Clean Water Act (CWA), or			х			
	that inject in Class I deep wells regulated by the Safe Drinking Water Act (SDWA), or			х			
	or that are zero dischargers that engage in CWA-equivalent treatment before land disposal, or			х	:		
á	that are managed in systems defined in 40 CFR 144.6(e) as Class V injection wells that do not engage in CWA-equivalent treatment before injection?			х			

ugo		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does	s the facility document that the following wastes:						
(1)	K141 to K145 and K147 to K151, or			! :			
(2)	Debris contaminated with F037, F038, K107 to K112, K117, K118, K123 to K126, K131, K132, K136, U328, U353, U359, or						
(3)	Soil and debris contaminated with D012 to D043, K141 to K145, and K147 to K151, or						
(4)	D012 to D043 that are not radioactive, or are managed in systems whose discharges are not regulated by the CWA, or that are zero dischargers that do not engage in CWA-equivalent treatment (as defined in OAC 3745-270-38(A)(3)) before land disposal, or are injected in Class I deep wells regulated by SDWA, or						
(5)	Radioactive wastes that are mixed D018-D043 wastes that are managed in systems whose discharges are not regulated by the CWA (as defined in OAC 3745-270-38(A)(3)), or that are zero dischargers that engage in CWA-equivalent treatment before land disposal, or are injected in Class I deep wells regulated by SDWA, or			х			
(6)	Radioactive wastes mixed with K141 to K145 and K147 to K151 wastes, or						
(7)	Soil and debris that is contaminated with radioactive wastes as specified in (5) and (6) above,			:			
are p	prohibited from land disposal?			]			
The	above wastes are not prohibited from land disposal if:						

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,		YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
(1)	the wastes meet the applicable treatment standards of OAC 3745-270-40 to 49, or			х			
(2)	an exemption has been granted under OAC 3745-270-06, or			х			
(3)	The wastes meet the applicable alternate treatment standards established pursuant to a petition granted under OAC 3745-270-44, or			х			
(4)	a case-by-case extension has been granted pursuant to OAC 3745-270-05?			х			
treati	the determination of whether the wastes meet or exceed the ment standard been made by either lab analysis or generator ledge?			х			
C-3b	(12) Waste Specific Prohibitions: Spent aluminum pot liners,	reactive	wastes,	and car	bamate v	<u>wastes:</u> OAC 3745-270-39	

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		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does	s the facility state or document that the following wastes:						
(1)	K156 to K159, K161, and soil and debris contaminated with these wastes, or						
(2)	P127, P128, P185, P 188 to P192, P194, P196 to P199, P201 to P205, U271, U278 to U280, U364, U367, U372, U373, U387, U389, U394, U395, U404, and U409 to U411, and soil and debris contaminated with these wastes, or						
(3)	D003 wastes (except unexploded ordnance and other explosive devices which have been the subject of an emergency response) that are managed in systems whose discharges are not regulated by the CWA, or that are zero dischargers that engage in CWA-equivalent treatment before land disposal, or are injected in Class I deep wells regulated by SDWA, or			х	; 		
(4)	K088 wastes and soil and debris contaminated with K088 wastes, or						
(5)	Radioactive wastes mixed with K088, K156 to K159, K161, P127, P128, P185, P188 to P192, P194, P196 to P199, P201 to P205, U271, U278 to U280, U364, U367, U372, U373, U387, U389, U394, U395, U404, and U409 to U411						
are p	prohibited from land disposal?						
The	wastes are not prohibited from land disposal if:						
(1)	the wastes meet the applicable treatment standards of OAC 3745-270-40 to 49, or			х			

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		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?	
(2)	an exemption has been granted under OAC 3745-270-06, or			х				
(3)	The wastes meet the applicable alternate treatment standards established pursuant to a petition granted under OAC 3745-270-44, or			х				
(4)	a case-by-case extension has been granted pursuant to OAC 3745-270-05?			х				
treat	the determination of whether the wastes meet or exceed the ment standard been made by either lab analysis or generator vledge?			х				
C-3c	i-3c Sampling and Analytical Requirements for Treatment Residues: OAC 3745-270-07 (B)							

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	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
C-3c(1) Sampling and Analytical Procedures: Appendix to	OAC 374	5-270-0	7 (B)			
Does the WAP specify the sampling and analytical procedures to be followed in testing the treatment residues?			х			
C-3c(2) Wastes or Contaminated Soils with Treatment Standard (B)(1)	ds Expres	sed as	Concent	trations in th	ne Waste Extract: OAC 3745-270-07	
For wastes with treatment standards expressed as concentrations in the waste extract, does the WAP specify that the treatment facilities will provide procedures for testing the treatment residues or an extract of such residues developed using the TCLP, to assure that the treatment residues meet the applicable treatment standards?			Х			
C-3c(3) Wastes or Contaminated Soils with Treatment Standard	ds Expres	sed as	Concent	rations of th	ne Waste: OAC 3745-270-07 (B)(2)	
For wastes or contaminated soil with treatment standards expressed as concentrations in the waste does the WAP provide procedures for testing the treatment residues (not an extract of the residues) to assure they meet applicable treatment standards?			х			

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	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?	
Does the WAP describe the frequency at which analysis of treatment residues will be repeated? Does the frequency chosen take into account the variability of the waste(s) and treatment process? Analysis must be performed if there is any reason to believe that the composition of the waste or the treatment process has changed.			х				
C-3d Notification and Certification Requirements: OAC 3745-270-	07(A), (B)	)(3), (B)(	4), and	(B)(5)			
C-3d(1) Retention of Generator Notices and Certifications: OAC 3745-270-07 (A)							
Does the WAP specify that the owner/operator of a treatment, storage, or disposal facility managing any waste subject to restrictions will review and maintain notices and certifications submitted by the initial generator of the waste (where applicable)?	х			C-11			
C-3d(2) Notification and Certification Requirements for Treatme (B)(4)	nt Residu	ies shipi	oed to la	nd dispos	sal facilities: OAC 3745-270-07(B)(3) and		
Does the WAP state or document that a one time notice will be sent with the initial shipment of waste for each waste stream to the land disposal facility?			х				
Does the notice include the elements in Table 2 of OAC 3745-270-07?			х				
Does the notice include a one-time certification as per OAC 3745-270-07(B)(4) signed by an authorized representative of the facility?			х				

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	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
For wastes with organic constituents having treatment standards expressed as concentration levels, if compliance with the treatment standards is based in whole or in part on the analytical detection limit, does the facility document that the certification statement shall contain the elements outlined in OAC 3745-270-07B(4)(c)?			Х			
C-3d(4) Notification and Certification Requirements for Character	eristic Wa	stes: 3	745-270	-07B(4)(d	i) and (e)	
For characteristic wastes subject to treatment standards in OAC 3745-270-40 or 49 (but not expressed as a method of treatment) and contain underlying hazardous constituents (UHC's)— if the wastes are treated on-site to remove the hazardous characteristic, then sent off-site to remove the UHC's, does the facility document that the certification statement shall contain the elements listed in OAC 3745-270-07B (4)(d)?			х		-	
For characteristic wastes that contain UHC's that are treated on site to remove both the characteristic and the UHC's, does the facility document that the certification statement shall contain the elements listed in OAC 3745-270-07B (4)(e)?			х			
C-3d(5) Notification and Certification for Wastes to be Further M	lanaged:	OAC 37	45-270-	07 (B)(5)		
Does the WAP specify that for treatment residues of restricted wastes generated by the permittee that will be further managed at a different TSD facility, permittee will comply with the notice and certification requirements applicable to generators under OAC 3745-270-07?	Х			C-12		
C-3d(6) Notification and Certification Requirements for Land Disposal Facilities: OAC 3745-270-07 (C)						<b></b>

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	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
If the permittee is a land disposal facility, does the facility document or state that it shall retain copies of the notice and certifications specified in OAC 3745-270-07(A) and (B), except where the wastes are recyclable materials used in a manner constituting disposal as per OAC 3745-58-30(B)?			х			
Does the WAP state a frequency at which the facility will test the wastes or extract of the wastes to assure wastes or treatment residues are in compliance with OAC 3745-270-40 to 49? <b>Note:</b> OAC 3745-270-07(C) specifies test method 1311 in SW-846 as referenced in OAC 3745-50-11.			х			
Does the facility specify in the WAP that test results will be documented?			х			
C-3d(7) Notification and Certification Requirements for facilities treating Hazardous Debris: OAC-3745-270-07(D)						
If the facility claims hazardous debris is excluded from the definition of hazardous waste as per OAC 3745-51-03, does the WAP document or state that the director will be notified as OAC 3745-270-07(D)(1) and (2)?			х			
That records of all analysis, evaluations, inspections, and any data or information obtained by the treater pertaining to key operating parameters of the treatment unit will be kept in the facility's files?			х			
That a certification statement as specified in OAC 3745-270-07(D)(3)(c) will be kept in the treatment facility's files?			х			
C-3d(8) Notification and Certification Requirements for facilities treating contaminated soil: OAC-3745-270-07(E)						

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the WAP document or state that if the facility receives notification from Ohio EPA that a contaminated soil no longer contains a listed hazardous waste, the facility will prepare a one-time documentation of the determination, including all supporting information, and maintain that documentation for a minimum of 3 years?			х			
C-3d(9) Notification and Certification Requirements for Recyclable Materials used in a Manner Constituting Disposal: OAC 3745-270-07 (B)(6)						
For wastes which are recyclable materials used in a manner constituting disposal as per OAC 3745-58-30, does the owner/operator of a treatment facility state it will submit a notice and certification to the Director in accordance with OAC 3745-279-07 (B)(6)?			х			
C-3e Additional Requirements Pertaining to Storage of Restricted	<u>//astes:</u> (	DAC 374	15-270-5	0 (A), (D	), & (F)	-
Do owner/operators of treatment, storage, or disposal facilities storing hazardous wastes that are restricted from land disposal demonstrate one of the following:  NOTE: Wastes cannot be stored longer than one year unless the permittee demonstrates that additional storage time is necessary						
to facilitate proper recover, treatment, or disposal.						
(1) they are storing such wastes in tanks, containers, or storage buildings, and such storage is solely for the purpose of accumulating sufficient quantities of waste to facilitate proper treatment, recovery, or disposal?  If yes is:			х			
(1)(a) each container clearly marked to identify its contents and the date each period of accumulation begins; and			х			

Part B Review Checklist - Section C Facility <u>OH7890008983</u>

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5		YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
NOT	each tank clearly marked with a description of its contents, the quantity of each hazardous waste received, and the date each period of accumulation begins, or such information for each tank is recorded and maintained in the operating record at that facility?  E: an ower or operator of a treatment, storage, or disposal ty may store such wastes for up to one year unless Ohio EPA			х			
(2)	Treatment standards as specified in OAC 3745-270-42 have been met?			х			
(3)	Treatment standards as specified in a variance granted under OAC 3745-270-44 have been met?			х			
(4)	Where treatment standards have not been specified, the hazardous waste is in compliance with the applicable prohibitions specified in section 3004 of RCRA?			х			
than desc withi	That for liquid hazardous wastes containing polychlorinated biphenyls at concentrations greater than or equal to 50 ppm, the facility meets the requirements of 40 CFR 761.65(b) under the Toxic Substances Control Act (ToSCA)?  Estrorage of PCB waste containing concentrations greater 50 ppm requires a ToSCA permit. The permittee must cribe procedures for removal of these wastes from storage in one year and treatment or disposal of the wastes in			х			
(6)	pliance with LDR's.  The waste is a hazardous remediation waste stored in a staging pile approved pursuant to OAC 3745-57-74?			х			

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raye		YES	NO	NA	Page #	Notes - NOD Comment #	include on Inspection Checklist?
C-3f	Additional Requirements for Treatment Surface Impoundment OAC 3745-270-04	t Exempt	ion:				
C-3f	(1) Treatment of Wastes in Surface Impoundments: OAC 3745-270-04(A)(1)						
restr	surface impoundments exempted from land disposal ictions under OAC 3745-270-04 (A), does the owner/operator onstrate the following:						
1)	The treatment of wastes otherwise prohibited from land disposal occurs in the surface impoundment?; and	-		х			
2)	That residues from treatment are analyzed to determine if they meet the applicable treatment standards or where no treatment standards have been established, determine that the residues meet the applicable prohibition levels in OAC 3745-270-30 to 39?; and			х			
3)	That representative samples of sludge and supernatant are tested separately rather than mixed to form homogeneous samples?			х			
restr	surface impoundments exempted from land disposal ictions under OAC 3745-270-04 (A), does the owner/operator onstrate that treatment residues will be removed annually if:						
1)	They do not meet the treatment standards of OAC 3745-270-40 to 49?			х			-
2)	They do not meet the prohibition levels of OAC 3745-270-30 to 39?			х			
3)	They are from the treatment of wastes which are prohibited from land disposal under OAC 3745-270-30 to 39?			х			

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
4) They are from managing wastes that are not de-listed?			Х			
Does the WAP document or state that evaporation of hazardous constituents shall not be considered to be treatment for purposes of a treatment surface impoundment exemption (OAC 3745-279-04(B))?			Х			:
C-3f(2) Subsequent Management of Residues in Surface Impoundments: OAC 3745-270-04(A)(2)(c)						
Does the WAP document that treatment residues may not be placed in any other surface impoundment for subsequent management?			х			
C-3f(3) Record keeping for Surface Impoundments: OAC 3745-270-04(A)(2)(d)						
Does the WAP state the facility will keep records in accordance with OAC 3745-54-13 and 3745-65-13?			х			
C-3f(4) Design Requirements for Surface Impoundments: OAC 3745-270-04(A)(3)						
Does the WAP document that the impoundment design meets the requirements of OAC 3745-56-21 or OAC 3745-67-21 and is in compliance with the applicable ground water monitoring requirements of OAC rules 3745-54-90 to 3745-54-101 or OAC Chapters 3745-54 to 3745-57 and 3745-205 <b>UNLESS</b> :						
1) The unit is exempted pursuant to OAC 3745-56-21(D) or (E), or OAC 3745-67-21(C) or ( D), or			х			

		YES	NO	NA	Page #	Notes - NOD Comment #	include on Inspection Checklist?
2)	The director has granted a waiver based on the following requirements:			:			
	(a) The impoundment has at least one liner that is demonstrated to not be leaking, and						
	(b) The impoundment is located at least 1/4 mile from an underground source of drinking water, and			X			
	(c) The impoundment is in compliance with generally applicable groundwater monitoring requirements for facilities with permits, or						
3)	The facility been granted a modification by the director that demonstrates the surface impoundment is located, designed, and operated so as to assure no migration of any hazardous constituent into groundwater or surface water will occur at any future time?			x			
	the facility submitted a written certification that the irrements of OAC 3745-270-04(A)(3) have been met?			х			
C-31	(5) <u>Sampling and Testing for Surface Impoundments:</u> OAC 3	3745-270	-04(A)(2	2)(a)			
Does the WAP include the procedures and schedules for sampling and analysis of treatment residues and the analysis of test data to determine if the residues meet the applicable treatment standards or prohibitions?				х			
C-3	Extensions, Exemptions, and Variances: OAC 3745-270-05,	06, and	14				
C-3	(1) <u>Case-by-Case Extensions to an Effective Date:</u> OAC 3745-270-05			·			

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	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
If the TSD has requested an extension to the effective date of any restriction in Subpart C of 40 CFR 268, have they submitted an application to the Regional Administrator, U.S. EPA, containing the information and certification described in 40 CFR 268.5(a) and (b), and has received U.S. EPA approval of the extension? The Director will recognize a denial by the U.S. EPA or an approval by the U.S. EPA.			х			
C-3g(2) Exemption from a Prohibition: OAC 3745-270-06						
If the facility has requested an exemption from a prohibition for the disposal of a particular restricted waste in a particular unit or units, have they submitted a petition to the Director demonstrating that there will be no migration of hazardous constituents from the disposal unit or injection zone for as long as the wastes remain hazardous? The petition must include the demonstration and certification specified in 40 CFR 268.6.			х			
If a petition has been approved under 40 CFR 268.6, has the owner/operator provided a copy of the required Notice of Approval?			х			
C-3g(3) Variance from a Treatment Standard: OAC 3745-270-44	-					
Has the treatment facility petitioned the Regional Administrator, U.S. EPA, for a site-specific variance from the treatment standard if a waste cannot be treated to the specified level or where the treatment technology is not appropriate to the waste? Has the applicant demonstrated that, because the physical or chemical properties of the waste differ significantly from wastes analyzed in developing the treatment standard, the waste cannot be treated to specified levels or by the specified methods?			х			

Part B Review Checklist - Section C Facility <u>OH7890008983</u>

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		YES	NO	NA	Page #	Notes - NOD Comment #	include on Inspection Checklist?
C-3g(4)	Requirements for Land Disposal Facilities with an approved Exemption, Extension or Variance: OAC 3745-279-05, 06, and 44						
279-05 o	by case extension has been approved under OAC 3745- or a petition has been approved under OAC 3745-279-06, facility included a copy of the Notice of Approval?			х			

### **RCRA Part B Review Checklist**

## **Section D**

**Process Information - Container Storage** 

#### **PART B REVIEW CHECKLIST**

## SECTION D - PROCESS INFORMATION - CONTAINER STORAGE Last updated: February 2005

Facility/ID #	ОН7890008983	Date	7/27/2010
Reviewer		DO	

Relevant Guidance Documents: None

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
D-1 <u>Containers</u>						
D-1a <u>Description of Containers</u> OAC 3745-55-71, 3745-55-72						
Does the application provide the following information about the containers used to treat/store hazardous waste:						
(1) approximate number of each type of container?	х			D-6		
(2) construction materials, dimensions and usable volumes?	Х			D-6		
(3) DOT specifications or other manufacturer specifications?	Х			D-6		
(4) liner specifications (if applicable)?	Х			D-6		
(5) compatibility with the container?	Х			D-6		
(6) markings and labels?, and	Х			D-2		
(7) container condition (new, used, reconditioned)?	х			D-1		
D-1b <u>Container Management Practices</u> OAC 3745-54-35, 3745-55-71, 3745-55-73, 3745-55-74	•					

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the application indicate the aisle space maintained between rows of containers in order to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency unless it can be satisfactorily demonstrated in the permit application that aisle space is not needed for any of these purposes?	х			D-3		
Does the application describe the container management practices used to ensure that hazardous waste containers are always kept closed during storage, except when adding or removing waste, and are not opened, handled, or stored in a manner that may cause them to rupture or to leak?	х			D-2		
Does the application include a discussion of procedures for transporting containers across the facility?	х			D-2		
Does the application indicate that the owner or operator will inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors, at least weekly?	х			D-3		
Does the application state that if a container holding a hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, that the owner or operator will transfer the hazardous waste from such container to a container that is in good condition?	х			D-3		
D-1c Special Requirements for Ignitable, Reactive or Incompatible Wastes OAC 3745-55-76, 3745-55-77, 3745-54-17						
Does the application state that containers holding ignitable or reactive waste must be located at least fifteen meters (fifty feet) from the facility's property line?			х		X-326 HAZARDOUS WASTE STORAGE AREAS ARE NOT LOCATED WITHIN 50 FEET OF THE DOE PORTS	

	YES	NO	NA	Page #	Notes - NOD Comment#	Include on Inspection Checklist?
Does the application state that ignitable or reactive waste will be separated and protected from sources of ignition or reaction including: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks, spontaneous ignition, and radiant heat?	х			D-3		
Does the application state that a storage container holding a waste that is incompatible with any waste or other materials stored nearby will be separated from the other materials or protected from them (by means of a dike, berm, wall, or other device)?	х			D-3		
Does the application state that incompatible wastes, or incompatible wastes and materials, will not be placed in the same container or in an unwashed container that previously held an incompatible waste or material?	х			D-1		
Does the application state that waste analyses, trial tests or other documentation will be used to show that the facility will take precautions to prevent reactions of ignitable or reactive waste, or between incompatible wastes or incompatible wastes and other materials?	х			C-9		
D-1d <u>Containers Without Free Liquids</u> OAC 3745-50-44 (C)(1)(b), 3745-55-75(C)						
Does the application describe the test procedures and results or other documentation or information to show that the wastes to be stored in the containers storage area do not contain free liquids?	Х			D-5		
Does the application describe how the storage area is designed and operated to drain and remove liquid resulting from precipitation?			х			
Does the application describe how the containers are elevated or otherwise protected from contact with accumulated liquid?	х			D-5		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the application state that containers that do not contain free liquids will contain the waste codes F020, F021, F022, F023, F026, and F027?			Х			
If yes, the storage area must have a containment system that meets the requirements in the remainder of this checklist.						
D-1e Containers with Free Liquids						
D-1e(1) <u>Secondary Containment System Design and Operation</u> OAC 3745-50-44 (C)(1)(a)(i), 3745-50-44 (C)(1)(c)&(d), 3745-55-75 (A) & (D)						
Does the application provide design and profile drawings of the existing or planned container storage area(s), showing the secondary containment system? Note that the secondary containment system requirements also apply to storage areas holding wastes, F020, F021, F022, F023, F026, and F027, whether or not the wastes contain free liquids.	x			D-3		
Does the application indicate on the drawings the areas in which incompatible wastes will be stored and/or the location or buffer zone for containers holding ignitable or reactive wastes?	x			D-3	Addressed in text	
Does the application provide the maximum number, volume, and stacking height of containers for each area in which containers are stored? Does the stacking height allow for leaks to be maintained in the secondary containment?	х			D-8		
D-1e(1)(a) Requirement for the Base or Liner to Contain Liquids OAC 3745-55-75 (B)(1), 3745-50-44 (C)(1)(a)(i)						
Does the application demonstrate the capability of the base to contain liquids, including:						
(1) statement that base is free of cracks or gaps?	Х			D-4		
(2) demonstration of imperviousness of base to wastes and precipitation?	Х			D-4		

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
(3) base design and materials of construction?	х			D-4		
(4) engineering evaluation of structural integrity of base?, and	Х			D-4		
(5) discussion of compatibility of base with wastes? Note, this may be important for reactive wastes that may form shock sensitive wastes when mixed with the metallic salts that may be found in concrete.	х			D-4		
D-1e(1)(b) Containment System Drainage OAC 3745-50-44 (C)(1)(a)(ii), 3745-55-75 (B)(2)						
Does the application submit information demonstrating that the base is sloped or the containment system is otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids?	х			D-4		
D-1e(1)(c) Containment System Capacity: OAC 3745-50-44 (C)(1)(a)(iii), 3745-55-75 (B)(3)						
Does the application provide calculations which demonstrate that the containment system will have sufficient capacity to contain 10 percent of the volume of the containers or the volume of the largest container, whichever is greater? This demonstration must discuss the volume of largest container, total volume of containers, containment structure capacity, and volume displaced by containers and other structures in the containment system. Containers that do not contain free liquids (as demonstrated by the facility) need not be considered in this determination.	x			D-4		
D-1e(1)(d) Control of Run-on: OAC 3745-50-44 (C)(1)(a)(iv), 3745-55-75 (B)(4)						
Does the application provide information that states that run-on into the containment system is prevented, unless the collection system has sufficient excess capacity in addition to that required in the above paragraph to contain any run-on that might enter the system? (A 24-hour 25-year storm event can be used as the basis for the calculations).	Х			D-4		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?	
Does the application describe the dikes, berms, drainage system, etc., used to prevent run-on, or provide calculations demonstrating that the containment system has sufficient excess capacity to contain run-on? (A 24-hour 25-year storm event can be used as the basis for the calculations—see <a href="http://hdsc.nws.noaa.gov/hdsc/pfds/orb/oh-pfds.html">http://hdsc.nws.noaa.gov/hdsc/pfds/orb/oh-pfds.html</a> ).			Х	D-5			
D-1e(1)(e) Removal of Liquids from Containment System: OAC 3745-50-44 (C)(1)(a)(v), 3745-55-75 (B)(5)							
Does the application state that spilled or leaked waste and accumulated precipitation will be removed from the sump or collection area in a timely manner to prevent overflow of the containment system (timely manner should be defined by the facility)?	Х			D-5			
Does the application describe the procedures and equipment used during liquids removal? Does the facility provide sump, pump, and piping drawings, if applicable?	х			D-5			
Does the application specify the methods for determining whether the removed material is a hazardous waste and for handling it as such?	х			D-5			

## **RCRA Part B Review Checklist**

### **Section D**

Process Information – Tank Storage and/or Treatment

#### **PART B REVIEW CHECKLIST**

# SECTION D - PROCESS INFORMATION - TANK STORAGE AND/OR TREATMENT Last updated: February 2005

Facility/ID #	ОН7890008983	Date	7/27/2010
Reviewer		DO	

Relevant Guidance Documents: Tank System Requirements Advisory (10/1997)

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
D-2	Tank Systems						
D-2a	Applicability: Tank systems - Exemptions from Tank System Requirements OAC 3745-55-90			4			
(Ow	the owner/operator claim any of the following her/Operator must submit documentation to support any hitheir tank system is exempt from any tank system frements.):		,	х		PORTS IS NOT APPLYING FOR AN OPERATING PERMIT FOR TANK STORAGE AND/OR TREATMENT	
(1)	Does the owner/operator have tanks that store or treat hazardous waste that contains no free liquid (material must meet requirements found in Method 9095 (Paint Filter Liquid Test) as described in "Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods," EPA Publication no. SW-846) and show that such tanks are situated inside a building with an impermeable floor? (If yes, then tanks are exempted from the secondary containment requirements in OAC 3745-55-93.)						
(2)	Does the owner/operator have tank systems, including sumps, that serve as secondary containment to collect or contain releases of hazardous wastes? (If yes, those tank systems are exempt from OAC 3745-55-93 (A) requirements.)	•					

		YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
oth co an ye	nees the owner/operator have tank systems, sumps, or oner such collection devices or systems used in njunction with drip pads, as defined in OAC 3745-50-10 d regulated under OAC 3745-57-80 to 3745-57-85? (If s, those systems must meet the requirements of OAC 45-55-90 to 3745-55-99.)						
D-2b	Tank System Description OAC 3745-50-44 (C)(2)(b),(d)						
(i.e., ab	ne application provide a description of the type of tank oveground, underground), material of construction, and number of tanks, as well as the specific location of nk?						
Are the provided	dimensions, capacity and shell thickness of each tank d?						
	gram of piping, instrumentation and process flow for each stem provided?						
D-2c	Written Assessment						
D-2c(1)	Existing Tanks - Assessment of Tank System's Integrity OAC 3745-50-44 (C)(2)(a) and 3745-55-91 (see definition for existing tanks in OAC 3745-50-10)	•					
	e application include documentation that the tank system aking or unfit for use?						
	nk system is found to be leaking or unfit for use, the or operator must comply with OAC Rule 3745-55-96.						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
cert eng	es the application include a written assessment, reviewed and ified by an independent, qualified, registered professional ineer, attesting to the structural integrity and suitability of h tank system for handling hazardous waste?		!				
At a	minimum, does this assessment consider the following:						
(1)	design standard(s), if available according to which the tank and ancillary equipment were constructed?;				:		
(2)	hazardous characteristics of the wastes that have been and will be handled?;						
(3)	existing corrosion protection measures (discussion regarding internal and external corrosion protection measures and corrosion allowance for the service life of the tank should be included)?;						
(4)	documented age of the tank system, if available (otherwise, an estimate of the age, manufactured date)?; and						
(5)	results of a leak test, internal inspection, or other tank integrity examination (non-enterable underground tanks must have a leak test, other tanks may use integrity tests other than a leak test, that addresses cracks, leaks, corrosion and erosion, and is certified by an independent, qualified, registered professional engineer in accordance with paragraph (D) of rule 3745-50-42.						
Inst Equ Stor	e: The practices described in the "American Petroleum itute" publication, "Guide for Inspection of Refinery ipment," chapter XII, "Atmosphere and Low-Pressure rage Tanks," fourth edition, 1981, may be used, where licable, as guidelines in conducting other than a leak test.						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
D-2	c(2) New Tanks - Assessment of Tank System's Integrity OAC 3745-50-44 (C)(2)(a) and 3745-55-92(A)						
revieus prof 42(I condess stre and rupt	s the permit application provide a written assessment that is swed and certified by an independent, qualified, registered essional engineer, in accordance with OAC Rule 3745-50-D), that the foundation, structural support, seams, nections, and pressure controls (if applicable) are adequately gned and that the tank system has sufficient structural night, compatibility with the waste(s) to be stored or treated, corrosion protection to ensure that it will not collapses, ure, or fail? At a minimum, does this assessment consider following:						
(1)	Design standard(s) according to which tank(s) and/or the ancillary equipment are constructed?;						
(2)	Specification of hazardous characteristics of the waste(s) to be handled?;						
(3)	For systems or components in which the external shell of a metal tank or any external metal component of the tank system will be in contact with the soil or water, does the assessment include a determination by a corrosion expert of the following:						
	(a) Factors affecting the potential for corrosion such as soil moisture content, soil pH, soil sulfides level, soil resistivity, structure to soil potential, influcence of nearby underground metal structures (e.g., piping), existence of stray electric current and existing corrosion protection measures (e.g., coating, cathodic protection)?						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
that are needed to e system during the us component, consistin following: (1) corrosion-resists as special alloys etc.; (2) corrosion-resists fiberglass, etc.) impressed curre (3) electrical isolatic joints, flanges, etc. Note: The practices described i Corrosion Engineers (NACE)" s Practice (RP-02-85)- Control of Buried, Partially Buried, or Subtand the "American Petroleum In	n the "National Association of standard, "Recommended External Corrosion on Metallic merged Liquid Storage Systems," nstitute (API)" publication 1632, round Petroleum Storage Tanks sed, where applicable, as						
(4) A determination of design protect underground tank damage due to vehicular t				i			
maintain the load of a full anchored to prevent flotat	ensure that tank foundations will tank and that tank systems will be ion or dislodgement where the saturated zone or is located ?; and						
(6) Design considerations to exithestand the effects of from	ensure that tank systems will ost heave?.	-					

		YES	NO	ŇÀ	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
D-2d	Description of Feed Systems, Safety Cutoff, Bypass Systems and Pressure Control (e.g., vents) OAC 3745-50-44 (C)(2)(c)						
transf provid	lescription of tank transfer equipment used to safely fer waste to storage or treatment tanks at the facility ded? The following should be considered (include ams of locations and type of control devices):						
1	Are level sensors/alarms (for high levels) systems and transfer connections (fill pipe design, connections, couplings, check valves, etc.) for feed systems described?;						
	Are cutoffs/Bypass systems for overflow protection described?; and						
<b>`</b>	Is pressure control relief provided and the location of the pressure-relief vents included (may be addressed in connection with ignitable/reactive/incompatible wastes)?						
D-2e	External Corrosion Protection OAC 3745-50-44 (C)(2)(e) and 3745-55-92 (F)				· · · · · · · · · · · · · · · · · · ·		
contir	external corrosion protection measures used to ensure nued structural integrity and suitability of each tank system andling hazardous waste described?						
If so,	the application should answer the following questions:						
`´	Was information provided to describe the materials and equipment used for corrosion protection for the tank system?;						
	Was information showing that the corrosion protection is adequate in regards to factors found in D-2c(2) provided?; and						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(3)	Was information provided which states that installation of any field-fabricated corrosion protection system was/will be supervised by an independent corrosion expert?						
D-21	New Tank Systems - Description of Plans and Procedur for Tank Installation OAC 3745-50-44 (C)(2)(f), 3745-55-92(B)	res					
	s the application include a detailed description of how the tank system(s) will be installed that includes:						
(1)	Will an independent, qualified installation inspector or an independent, qualified, registered professional engineer inspect each new tank system prior to covering, enclosing, or placing a new tank system or component in use? If so, does the application describe that the inspection will determine if there is the presence of weld breaks, punctures, scrapes of protective coatings, cracks, corrosion and other structural damage or inadequate construction/installation (and all discrepancies shall be remedied before the tank system is covered, enclosed, or placed in use)?;						
(2)	Does the application describe how the new tank systems or components that are placed underground and that are backfilled will be (or have been) provided with a backfill material that is a noncorrosive, porous, homogeneous substance and that is installed so that the backfill is placed completely around the tank and compacted to ensure that the tank and piping are fully and uniformly supported?;						
(3)	Does the application describe how all new tanks and ancillary equipment will be tested for tightness prior to being covered, enclosed, or placed in use?						

<ul> <li>(4) Does the application state that repairs will be made if the tank system is found not to be tight and that repairs necessary to remedy the leak(s) in the system will be performed prior to the tank system being covered, enclosed, or placed in use?</li> <li>(4) Does the application describe how ancillary equipment will be supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction?</li> <li>Note: The piping system installation procedures described in "American Petroleum Institute (API)" publication 1615 (November 1979), "Installation of Underground Petroleum Storage Systems," or ANSI standard B32.3, "Petroleum Refining Piping," and ANSI standard B32.4, "Liquid Petroleum Transportation Piping System," may be used, where applicable, as guidelines for proper installation of piping systems.</li> <li>(5) Does the application state that the owner or operator will obtain and keep on file at the facility written statements by those persons required to certify the design of the tank system in accordance with the requirements of OAC 3745-55-92 (B) through (F), that attest that the tank system was</li> </ul>		
be supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction?  Note: The piping system installation procedures described in "American Petroleum Institute (API)" publication 1615 (November 1979), "Installation of Underground Petroleum Storage Systems," or ANSI standard B32.3, "Petroleum Refining Piping," and ANSI standard B32.4, "Liquid Petroleum Transportation Piping System," may be used, where applicable, as guidelines for proper installation of piping systems.  (5) Does the application state that the owner or operator will obtain and keep on file at the facility written statements by those persons required to certify the design of the tank system in accordance with the requirements of OAC 3745-		
obtain and keep on file at the facility written statements by those persons required to certify the design of the tank system in accordance with the requirements of OAC 3745-		
properly designed and installed and that repairs, pursuant to paragraphs (B) and (D) of OAC Rule 3745-55-92 were performed? These written statements shall also include the certification as required in paragraph (D) of OAC Rule 3745-50-42.		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the application indicate that secondary containment is/will be provided for:						
(1) All new tank systems or components, prior to their being put into service?;						
(2) All existing tank systems used to store or treat EPA hazardous waste numbers F020, F021, F022, F023, F026, and F027?;						
(3) Tank systems that store or treat materials that become hazardous wastes subsequent to January 12, 1987, within two years after the material becomes a hazardous waste?						
D-2h(1) Requirements for Secondary Containment and Leak Detection OAC 3745-55-93 (B) & (C) and 3745-50-44 (C)(2)(g)						
Does the application describe how the secondary containment system has been (will be) designed, installed and operated to prevent any migration of waste or accumulated liquid from the tank system to the soil, ground water, or surface water at any time during the use of the tank system, and that the secondary containment system can detect and collect releases and accumulated liquids performed?						
In order to meet the requirements of the above paragraph, does the application describe:						
(1) How the secondary containment system is constructed of or lined with materials that are compatible with the waste(s) to be placed in the tank system?						
(2) That the secondary containment system has sufficient strength and thickness to prevent failures caused by any of the following:						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
l	<ul><li>(a) pressure gradients (including static head and external hydrological forces)?;</li></ul>						
	(b) physical contact with the wastes (Compatibility, Corrosion)?;						
	(c) climatic conditions (Discussion regarding UV, frost heave, precipitation, etc.)?; and						
	(d) stress of daily operation (including stresses from nearby vehicular traffic)?	_	-				
(3)	Calculations to show that the secondary containment system is placed on a foundation or base that is capable of:						
	(a) providing support?;						
	(b) resisting pressure gradients above and below the system?; and						
	(c) preventing failure due to settlement, compression, or uplift?						
(4)	Is a description and detailed plan of the leak detection system provided, including the following:						
dete Dire	DTE: Daily inspections may constitute acceptable form of leak ection monitoring. Reviewer can refer to OSWER Policy ective 9483.00-3, 10/2/87 and RCRA Permit Policy npendium 9483.1988 (08) for assistance.)						
	(a) its operating principle?;						
	(b) design features?; and						
	(c) operating procedures?						

		YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
(5)	Does the application include a detailed plan and description that the leak detection system will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours?; OR						
	Is it shown that the prevailing site conditions or detection technologies will not allow detection of a release within 24 hours? If so, can the owner/operator						
	(a) specify the earliest practical time that detection can take place?; and						
	(b) indicate why this longer period does not pose a threat to human health and the environment?						
(6)	Does the application show how the secondary containment system is sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation?						
(7)	Is documentation provided on how it will be ensured that spilled or leaked wastes and precipitation will be removed from the secondary containment system within 24 hours? OR						
	(a) Are details provided on why wastes and precipitation cannot be removed within 24 hours, and the earliest practice time that removal can take place and how it will take place?; and						
	(b) Is it demonstrated why this longer period does not pose a threat to human health and the environment?						

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
D-2h(2) Secondary Containment Devices: Requirements for External Liner, Vault, Double-Walled Tank or Equivaler Device  OAC 3745-50-44 (C)(2)(g) and 3745-55-93 (D) & (E)	<u>t</u> _					
Does the application indicate that secondary containment for each tank includes at least one of the following:				:		
(1) a liner external to the tank?,						
(2) a vault?,						
(3) a double-walled tank?, or						
(4) an equivalent device approved by the director?						
For each external liner system (e.g., concrete dike), does the application include the following information:						
(1) Calculations to show that the external liner system is designed or operated to contain 100 percent of the capacity of the largest tank within its boundary?						:
(2) A demonstration that the external liner system is designed or operated to prevent run-on or infiltration of precipitation? OR						
A demonstration that the collection system has sufficient excess capacity to contain run-on and precipitation from a 25-year 24-hour rainfall as well as 100 percent of the capacity of the largest tank within its boundary?						
NOTE: For 25-year, 24-hour rainfall information, see <a href="http://hdsc.nws.noaa.gov/hdsc/pfds/orb/oh_pfds.html">http://hdsc.nws.noaa.gov/oh/hdsc/currentpf.htm</a> .  http://www.nws.noaa.gov/oh/hdsc/currentpf.htm.						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(3)	A demonstration that the external liner system is free of cracks or gaps?, and						
171, 9	A demonstration that the system is designed and installed to surround the tank completely and to cover all surrounding soil likely to come in contact with the wastes if there were releases from the tank(s) (i.e., capable of preventing lateral and vertical migration of the hazardous waste)?  E: The reviewer must refer to Federal Register Vol. 53, No. /2/88, pg. 34084 for information regarding coatings for al liners.)						
(5)	A demonstration that the external liner system is constructed with chemical-resistant water stops in place at all joints, if any (for concrete liners only)?						
(6)	A demonstration that the external liner is provided with an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of wastes into the concrete (for concrete liners only)?						
For ea	ch vault system, is the following information provided:						
(1)	Calculations to show that the vault system is designed or operated to contain 100 percent of the capacity of the largest tank within its boundary?						

, ,		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(2)	Calculations to show that the vault system is designed or operated to prevent run-on or infiltration of precipitation? OR						
	Calculations to demonstrate that the collection system has sufficient capacity to contain runon and precipitation from a 25-year 24-hour rainfall as well as 100 percent of the capacity of the largest tank within its boundary?						
(3)	A demonstration that the vault is constructed using chemical-resistant water stops in place at any joints and specification of the material used for the water stops?						
(4)	A demonstration that the vault is provided with an impermeable interior coating or lining that is compatible with the stored waste and that will prevent migration of waste into the vault material? If so, does the application specify coating or lining used, and provide the manufacturer's data sheet?						
(5)	The method used to protect against the formation and ignition of vapors within the vault, if the wastes are ignitable or reactive?						
(6)	The specific exterior moisture barrier used to prevent migration of moisture into the vault if subject to hydraulic pressure (provide the manufacturer's data sheet)? OR						
	A description in detail on how the vault is designed or operated to prevent the migration of moisture into the vault if the vault is subject to hydraulic pressure?						

, ( <u>)</u>		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
	For each double-walled tank, is the following information provided:						
(1)	A demonstration that the unit is designed as an integral structure (i.e., an inner tank completely enveloped within an outer shell) so that any release from the inner tank is contained by the outer shell?		,				
(2)	For metal tanks only: The specific type(s) of corrosion protection used for the primary tank interior and the external surface of the outer shell?						
(3)	A detailed plan and description of the leak detection system used including the principle of operation, design, and operating characteristics? A demonstration that it is a continuously operating unit, capable of detecting a release within 24 hours?; Unless, the owner/operator can answer the following questions:						
	(a) Can the owner/operator show that the prevailing site conditions or detection technologies will not allow detection of a release within 24 hours?;						
	(b) Can the owner/operator specify the earliest practical time that detection can take place?; and						
	(c) Can the owner/operator demonstrate why this longer period does not pose a threat to human health and environment?						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?	
D-2h(3) Secondary Containment and Leak Detection  Requirements for Ancillary Equipment:  OAC 3745-50-44 (C)(2)(g) and 3745-55-93 (F)								
	The reviewer should refer to Federal Registers and echnical guides for description of the items discussed in ction.)							
(1)	Is aboveground piping (exclusive of flanges, joints valves, and other connections) inspected daily? (If yes, aboveground piping does not need secondary containment.)							
(2)	Does ancillary equipment have welded flanges, welded joints, and welded connections that are visually inspected daily? (If yes, these items do not need secondary containment.)							
(3)	Does ancillary equipment include sealless or magnetic coupling pumps and sealless valves that are visually inspected on a daily basis? (If yes, these items do not need secondary containment)							
(4)	Is aboveground pressurized piping equipped with automatic shut-off devices (e.g., excess flow check valves, flow metering shutdown devices, loss of pressure-actuated devices) that are visually inspected daily? (If yes, this type of piping does not need secondary containment.)							
(5)	For other ancillary equipment, is a detailed plan and description provided which includes the following information:			:				

	` ` `	`	YES	NO	NA	Page #	Notes - NOD Comment #	include on Inspection Checklist?
	(a)	how each tank system's ancillary equipment is provided with secondary containment such as jacketing, double-walled piping, or a trench?;						
	(b)	how the containment system has been (will be) designed, installed and operated to prevent any migration of waste or accumulated liquid to the soil, groundwater, or surface water at any time during its use?; and						
	(c)	how the containment system can detect and collect releases and accumulated liquids?						
At a m	ninimum, is the foll	owing information included:						
(1)	construct or line	of the materials of construction used to e the system? (Show that these ompatible with the wastes in the tank						
(2)	A demonstration that the system has sufficient strength and thickness to prevent failure cause by any of the following:		:					
	(a)	pressure gradients (including static head and external hydrological forces)?;						
	(b)	physical contact with the wastes (compatibility, corrosion)?;				i		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on inspection Checklist?
(c) climatic conditions (Discussion regarding UV, frost heave, precipitation, etc.)?; or						
(d) stress of daily operation (includir stresses from nearby vehicular traffic)?	ng					
(3) A presentation of calculations to show that the secondary containment system is placed on a foundation or base that is capable of:						
(a) providing support?;						
(b) resisting pressure gradients abo and below the system?; and	ve					
(c) preventing failure due to settlem compression, or uplift?	ent,					
(4) A description and detailed plan of the leak detection system, including the following information:	n					
(NOTE: Daily inspections may constitute acceptable form of detection monitoring. Reviewer can refer to OSWER Policy Directive 9483.00-3, 10/2/87 and RCRA Permit Policy Compendium 9483.1988 (08) for assistance.)						
(a) its operating principle?;						
(b) design features?; and						
(c) operating procedures?						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(5)	A detailed plan and description that the leak detection system will detect the failure of either the primary or secondary containment structure or the presence of any release of hazardous waste or accumulated liquid in the secondary containment system within 24 hours?; OR						
	A demonstration that the prevailing site conditions or detection technologies will not allow detection of a release within 24 hours? If so, can the owner/operator:						:
	(a) specify the earliest practical time that detection can take place?; and						
	(b) Indicate why this longer period does not pose a threat to human health and the environment?						
(6)	A demonstration on how the secondary containment system is sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation?						
(7)	A document on how it will be ensured that spilled or leaked wastes and precipitation will be removed from the secondary containment system within 24 hours?  OR						
	(a) Details on why wastes and precipitation cannot be removed within 24 hours, and specify the earliest practice time that removal can take place and how it will take place; and						

, , ,		•	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
	(b)	A demonstration on why this longer period does not pose a threat to human health and the environment.		;				
D-2h(4	4) Requirements f	or Tank Systems Without Secondary Containment OAC 3745-50-44 (C)(2)(g) and	d 3745-5	55-93 (1)				
owner		t has not yet been provided, has the a detailed plan and described how they wing:						
(1) For non-enterable underground tanks, an annual (once every 365 days) leak test that meets the requirements of OAC 3745-55-91 (B)(5) (or other tank integrity test approved by the director) with the results sent to the director?								
(2)	For other than i	non-enterable underground tanks, either:				E		
	(a)	An annual (once every 365 days) leak test that meets the requirements of OAC 3745-55-91 (B)(5) (or other tank integrity test approved by the director)?; OR						
	(b)	A schedule and procedure for an assessment of the overall condition of the tank system by an independent, qualified, registered professional engineer?						

Page	2	7
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		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
	(i) Are the schedule and procedures adequate to detect obvious cracks, leaks, and corrosion or erosion that may lead to cracks and leaks, and does the owner or operator remove the stored waste from the tank to allow the condition of all internal tank surfaces to be assessed?						
	(ii) Is the frequency of these assessments based on the material of construction of the tank and its ancillary equipment, the age of the system, the type of corrosion or erosion protection used, the rate of corrosion or erosion observed during the previous inspection, and the characteristics of the waste being stored or treated?						
sec	For ancillary equipment, will the owner or operator conduct an annual (once every 365 days) leak test (or other annual integrity assessment measures approved by the director)?  TE: These procedures must be completed until such time as indary containment meeting the requirements of OAC 3745-3 is provided)						
(4)	Does the application state that a record of results of the annual assessments described above will be maintained on file at the facility?	-					
(5)	Does the application state that if a tank system or component is found to be leaking or unfit for use as a result of the annual leak test or assessment described above, the owner or operator will comply with OAC Rule 3745-55-96 - Response to leaks or spills and disposition of leaking or unfit for use tank systems?						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
D+2i	Variance from Secondary Containment Requirements OAC 3745-50-44 (C)(2)(h) and OAC 3745-55-93(G), 374	5-55-93	(H)				
Rule	the facility requested a variance (in accordance with OAC 3745-55-93(H)) from the secondary containment irements described in OAC Rule 3745-55-93?						
If ye	s, does the permit application include:						
(1)	Detailed plans and engineering and hydrogeologic reports, as appropriate, describing alternate design and operating practices that will, in conjunction with location aspects, prevent the migration of any hazardous waste or hazardous constituents into the groundwater or surface water at least as effectively as secondary containment during the active life of the tank system?						
(2)	A description of how no substantial present or potential hazard will be posed to human health and the environment in the event a release does migrate to ground water or surface wate?						
D-2j	Controls and Practices to Prevent Spills and Overflows: OAC 3745-50-44 (C)(2)(i) and 3745-55-94 (B)		<b>.</b>	•			
(1)	Does the application include a description of general handling practices/controls to ensure there are no/minimal releases from tank and containment systems, including from the transfer, loading and unloading, and other management of wastes (discussion of types of hoses, pumps, piping, etc.)?						
(2)	Does the application include a detailed description of controls and practices used to prevent spills and overflows that includes the following information:						

	``		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
	(a)	spill prevention controls (e.g., check valves, dry disconnect couplings)?;		1				
ı	(b)	overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff, or bypass to a standby tank)?; and	:					
	(c)	maintenance of sufficient free board in uncovered tanks to prevent overtopping by wave or wind action or by precipitation?						
D-2l O	( AC	Inspections: 3745-55-95						
(1)		s the owner/operator provided a schedule and procedure inspecting overfill controls?						
(2)		s the owner/operator described how they will inspect, at st once each operating day, the following:						
	(a)	aboveground portions of the tank system, if any, to detect corrosion or releases of waste?						
	(b)	data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design?						
	(c)	the construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system (e.g., dikes) to detect erosion or signs of release or hazardous waste (e.g., wet spots, dead vegetation)?						

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(3) Has the owner/operator described inspection of cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they are functioning properly:						
(a) the proper operation of the cathodic protection system must be confirmed within six months after initial installation and annually thereafter?						
<ul> <li>(b) all sources of impressed current must be inspected and/or tested, as appropriate, at least bimonthly (i.e., every other month)?</li> <li>Note: The practices described in the "National Association of Corrosion Engineers (NACE)" standard, "Recommended Practice (RP-02-85) - Control of External Corrosion on Metallic Buried, Partially Buried, or Submerged Liquid Storage Systems," and the "American Petroleum Institute (API)" publication 1632, "Cathodic Protection of Underground Petroleum Storage Tanks and Piping Systems," may be used, where applicable, as guidelines in maintaining and inspecting cathodic protection systems.</li> </ul>						
(4) Does the application state that the owner or operator will document in the operating record fo the facility an inspection of those items listed above in section D-2k?						
D-2I <u>Ignitable, Reactive, and Incompatible Wastes</u> OAC 3745-50-44 (C)(2)(j), 3745-55-98, 3745-55-99						
(1) Does the application indicate that ignitable, reactive or incompatible wastes are to be managed in the tanks?						
If ignitable or reactive wastes are to be managed in tanks, the following must be demonstrated:						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
	(a) Does the application include a description of how the waste is treated, rendered or mixed before or immediately after placement in the tank systems so that it no longer is ignitable or reactive and that OAC 3745-54-17 (B) is complied with?; or						
	(b) Does the application include a description of how the waste is stored or treated in a manner such that it protects against ignition or reaction (e.g., oxygen monitoring, specifically designed vents, nitrogen blankets, flame arrestors, etc.)?; or						
	(c) Does the application state that the tank system is used solely for emergencies?;						
(2)	Does the application state that incompatible wastes or incompatible wastes and materials will not be placed in the same tank system or in a tank system that has not been decontaminated and that previously held an incompatible waste or material? (see appendix to OAC 3745-55-99 for examples of incompatible wastes and materials.)?						
(3)	If the facility stores or treats ignitable or reactive waste in tanks and/or proposes to mix incompatible wastes or incompatible waste and other materials, does the application state the precautions that will be taken to prevent reactions which:						
	(a) Generate extreme heat or pressure, fire or explosions, or violent reactions?						
	(b) Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment?						

,	`	YES	NO	NĀ	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(c)	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?						
(d)	Damage the structural integrity of the device or facility?						
(e)	Through other like means threaten human health or the environment.						

### Resource Lists for Reviewing Tank Systems

#### Regulatory List

U.S. EPA, Office of Solid Waste, Technical Resource Documents for the Storage and Treatment of Hazardous Waste in Tank Systems, OSWER Policy Directive No. 9483.00-1, EPA/530-SW-86-044 (Washington, DC: December 1986).

U.S. EPA 40 CFR Parts 260 to 271.

U.S. EPA, Office of Waste Program Enforcement, *Hazardous Waste Tank Systems Inspection Manual*, OSWER 9938.4 (Washington, DC: September 1988).

U.S. EPA, Office of Solid Waste and Emergency Response, OSWER Policy Directive No. 9483.00-3, (Washington, DC. October 2, 1987).

U.S. EPA, Office of Solid Waste and Emergency Response, RCRA Permit Policy Compendium Package - Revision 8 - July 1998, (Washington DC: July 1998)

Ohio EPA, Division of Hazardous Waste Management, RCRA Engineering Unit, *Tank System Requirements Advisory*, (Columbus, Ohio: October 27, 1997)

Abbreviated Technical List (another list found in Tank System Requirements Advisory)

"Recommended Rules for Design & Construction of Large Welded, Low-Pressure Storage Tanks," API 620

#### Coatings

"A Guide to the Useof Waterproofing, Damp proofing, Protective and Decordive Barrier Systems for Concrete," 515.1 R-79, American Concrete Institute

#### Corrosion

Recommended Practice 651 - "Cathodic Protection of Aboveground Petroleum St orage Tanks," American Petroleum Institute

"Recommended Practices" by the National Assoc of Corrosion Engineers (e.g., RP-02-85, & RP-01-69)

"Recommended Practices" by the Petroleum Equipment Institute (e.g., PEI/RP 100-86)

"Cathodic Protection of Underground Petroleum Storage Tanks & Piping Systems," API 1632

"Installation of Underground Petroleum Storage Systems," API 1615

#### **Evaluating Tank Shells**

"Tank Inspection, Repair, Alteration, and Reconstruction," API 653

"Boiler & Pressure Vessel Code, Sect. V, "Nondestructive Examination," Article 5; ASME

"Boiler & Pressure Vessel Code, Sect. III, Division. 1, Appendix. VIII, paragraphs UA-94 & 95; ASME

### <u>Miscellaneous</u>

Perry's Chemical Engineers' Handbook, Ch. 6 - "Joints" -contains descriptions of flange to pipe connections

### **RCRA Part B Review Checklist**

### **Section D**

**Process Information - Containment Buildings** 

### PART B REVIEW CHECKLIST

# SECTION D - PROCESS INFORMATION - CONTAINMENT BUILDINGS Last updated: May 2005

Facility/ID #	ОН7890008983	Date	7/27/2010
Reviewer		DO	

Relevant Guidance Documents: RCRA, Superfund & EPCRA Call Center Training Module: Containment Buildings. Located at: http://www.epa.gov/nscep/

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
D-3	Containment Buildings						
D-3a	Design Standards						
D-3a(1)	<u>Structural Design Standards</u> OAC 3745-205-100 (A) & (B), 3745-205-101 (A) (1)-(4)			х		PORTS IS NOT APPLYING FOR AN OPERATING PERMIT FOR CONTAINMENT BUILDINGS	
containr containr	e application provide evidence that the floor and nent walls of the unit, including the secondary nent system if required under OAC Rule 3745-205-101 must be designed and constructed:						
(1)	Of man made materials of sufficient strength to support themselves, the waste contents, and any personnel and heavy equipment that operates within the unit?						
(2)	To prevent failure due to:						
	(a) Pressure gradients, settlement, compression, or uplift?						
	(b) Physical contact with the wastes to which they are exposed?						
	(c) Climatic conditions?						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
	(d) The stresses of daily operation, including the movement of heavy equipment within the unit and contact of such equipment with containment walls?						
(3)	So that is has sufficient structural strength to prevent collapse or other failure?						
	e application provide evidence that all surfaces to be in with hazardous waste are chemically compatible with astes?						
generall Concrete Material structura	standards established by professional organizations y recognized by the industry, such as the American e Institute (ACI) and the American Society of Testing s (ASTM), used in demonstrating that the unit meets the al integrity requirements of OAC 3745-205-100 (A) and 8-101 (A)?						
applicati	eight doors and windows are used in the structure, the con must provide evidence that the following criteria have et for an exception to the structural strength requirement ade:						
(1)	The use of the doors and windows is appropriate to the nature of the waste management operation to take place in the unit.						
(2)	The doors and windows provide an effective barrier against fugitive dust emissions as required in OAC 3745-205-101 (C)(1)(d).						
(3)	The unit is designed and operated in a manner that assures that waste will not actually come in contact with these openings.						
treatme containr	e application state that incompatible hazardous waste or nt reagents will not be placed in the unit or its secondary ment system if they could cause the unit or secondary ment system to leak, corrode, or otherwise fail?						

,	·	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
	he application provide evidence that the containment g has a primary barrier that is :						
(1)	Designed to be sufficiently durable to withstand the movement of personnel, waste, and handling equipment in the unit during the operating life of the unit?						
(2)	Appropriate for the physical and chemical characteristics of the waste to be managed?						
eviden structu exposu assure	on the above criteria, does the application provide ce that the unit is a completely enclosed, self supporting re, possessing four walls, a roof, and a floor, that prevents are to the elements (e.g., precipitation, wind, run-on), and s containment of managed waste, thereby qualifying it as ainment building?						
D-3a(2	) <u>Free Liquid Management</u> OAC 3745-205-100(C), 3745-205-101 (B)						
contair	he containment building manage a hazardous waste ning free liquids, as determined by the paint filter test, a examination, or other appropriate means?						
If yes, building	does the application demonstrate that the containment g has:						
(1)	A primary barrier designed and constructed of materials to prevent the migration of hazardous constituents into the barrier (e.g., a geomembrane covered by a concrete wear surface)?						
(2)	A liquid collection and removal system designed and constructed to minimize the accumulation of liquid on the primary barrier of the containment building?						
	(a) Is the primary barrier sloped to drain liquids to the associated collection system?						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
	(b) Is it stated that liquids and wastes will be collected and removed to minimize hydraulic head on the containment system at the earliest practicable time?						
(3)	A secondary containment system including:						
	(a) A secondary barrier designed and constructed to prevent migration of hazardous constituents in to the barrier?						
	(b) A leak detection system that is capable of detecting failure of the primary barrier and collecting accumulated hazardous wastes and liquids at the earliest practicable time?						
Is the	leak detection system constructed, at a minimum:						
(1)	With a bottom slope of one per cent or more; and						
(2)	Constructed of a granular drainage material with a hydraulic conductivity of 1 x 10 <sup>-2</sup> cm/sec or more and a thickness of twelve inches (30.5 cm) or more, or constructed of synthetic or geonet drainage materials with transmissivity of 3 x 10 <sup>-5</sup> m <sup>2</sup> /sec or more?						
which releas	tment is to be conducted in the building, is the area in such treatment will be conducted designed to prevent the se of liquids, wet materials, or liquid aerosols to other ns of the building?						
Is the	secondary containment system:						
(1)	Constructed of materials that are chemically resistant to the waste and liquids to be managed in the containment building?						

,		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(2)	Of sufficient strength and thickness to prevent collapse under the pressure exerted by overlaying materials and by any equipment used in the containment building?						
containi	entainment building is used to serve as a secondary ment system for tanks placed within the building, does it a requirements of OAC Rule 3745-55-93 (B), (C)(1), and						
day gen	vner or operator of an existing unit, other than a ninety- erator, wishes to obtain a variance to delay the ary containment requirement for up to two years, have						
(1)	Demonstrated that the unit substantially meets the standards in OAC Rules 3745-205-100 to 3745-205-102?						
(2)	Provided a written notice to the director of their request, describing the unit and its operating practices with specific reference to the performance of existing containment systems, and describing their specific plans for retrofitting the unit with secondary containment?						
(3)	Responded within thirty days to any comments from the director on these plans?						
(4)	Fulfilled the terms of the revised plans if such plans are approved by the director?						
D-3b(1)	Emission Controls, Containment, and Operating Standards: OAC 3745-205-100 (D) & (E), 3745-205-101 (C) & (D)						•
will use	e application provide evidence that the owner or operator controls and practices to ensure containment of the ous waste, and at a minimum:		-				

·		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(1)	Maintain the primary barrier to be free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released from the primary barrier?						
(2)	Maintain the level of the stored or treated hazardous waste within the containment walls of the unit so that the height of any containment wall is not exceeded?						
(3)	Take measures to prevent the tracking of hazardous waste out of the unit by personnel or by equipment used in handling the waste?	_					
	(a) Is there an area designated for the decontamination of equipment?						
	(b) Is it provided that any rinseate must be collected and properly managed?						
(4)	Take measures to control fugitive dust emissions such that any openings (doors, windows, vents, cracks, etc.) exhibit no visible emissions (see 40 CFR part 60, appendix A, method 22- visual determination of fugitive emissions from material sources and smoke emission from flares)?						
	(a) Are all associated particulate collection devices (e.g., fabric filter, electrostatic precipitator) operated and maintained with sound air pollution control practices (see 40 CFR part 60, subpart 292 for guidance)?						
	(b) Is the state of no visible emissions to be maintained effectively at all times during routine operating and maintenance conditions, including when vehicles and personnel are entering and exiting the unit?						

•

		YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
certificate state require 101, a files for	the application state that the owner or operator will obtain cation by a qualified professional engineer registered in the of Ohio that the containment building design meets the ements of paragraphs (A) to (C)(4) of OAC Rule 3645-205- and place it in the facility's operating record (or in on-site or generators who are not formally required to have ting records) prior to operation of the unit?						
prom; cause	the application state that the owner or operator will repair of the operator will repair of the operator will repair on the operator will repair of the operator will repair on the operator will repa						
hazar	detection of a condition that has led to a release of dous waste (e.g., upon detection of leakage from the ry barrier), is it stated that the owner or operator will:						
(1)	enter a record of the discovery in the facility operating record?						
(2)	immediately remove from service the portion of the containment building affected by the condition?						
(3)	Determine what steps must be taken to repair the containment building, remove any leakage from the secondary collection system, and establish a schedule for accomplishing the cleanup and repairs?						
(4)	Notify the director of the condition within seven days after the discovery of the condition, and provide a written plan to the director with a description of the steps taken to repair the containment building and with the schedule for accomplishing the work within fourteen working days?						

	YES	NO	NA	Page #	Notes - NOD Comment #	include on Inspection Checklist?
Upon completing all repairs and cleanup, is it documented that the owner or operator will notify the director in writing and provide a verification, signed by a qualified professional engineer registered in the state of Ohio, that the repairs and cleanup have been completed according to the written plan submitted in accordance with OAC Rule 3745-205-101 (C)(3)(a)(iv)?						
Does the application state that the owner or operator will inspect and record in the facility's operating record data gathered from monitoring equipment, leak detection equipment, the containment building, and the area immediately surrounding the containment building at least once every seven days in order to detect signs of releases of hazardous waste?						
Does the application state that the owner or operator of containment buildings that contain both areas with secondary containment and without secondary containment will:						
(1) Design and operate each area in accordance with the requirements in OAC Rule 3745-205-101 (A) to (C)(4)?						
(2) Take measures to prevent the release of liquids or wet materials into areas without secondary containment?						
(3) Maintain in the facility's operating record a written description of the operating procedures used to maintain the integrity of areas without secondary containment?						
D-3c(1) Waiver From Secondary Containment Requirements: OAC 3745-205-101 (E)						
Does the owner or operator wish that the director waive the requirements for secondary containment for a permitted containment building?						
If yes, is it demonstrated in the permit, notwithstanding any other provisions of OAC Rules 3745-205-100 to 3745-205-102, that:						

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(1)	The only free liquids in the unit are limited amounts of dust suppression liquids required to meet occupational health and safety requirements?		:				
(2)	Containment of managed wastes and liquids can be assured without a secondary containment system?						

# **RCRA Part B Review Checklist**

**Section F** 

**Procedures to Prevent Hazards** 

### **PART B REVIEW CHECKLIST**

# SECTION F - PROCEDURES TO PREVENT HAZARDS Last updated: May 2005

Facility/ID #	ОН7890008983	Date	7/27/2010
Reviewer		DO	

Relevant Guidance Documents: None

		YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
F-1	Security						
F-1a	<u>Waiver</u> OAC 3745-50-44 (A)(4), 3745-54-14 (A)						
requirer	ver of the security procedures and equipment ments is requested, does the owner or operator adequate demonstration of the following:			х			
F-1a(1)	Injury to Intruder: OAC 3745-54-14 (A)(1)						
equipm injure u	ysical contact with the waste, structure, or ent within the active portion of the facility will not nknowing or unauthorized persons or livestock y enter the active portion of a facility?; and	х			F-1		
F-1a(2)	Violation Caused By Intruder: OAC 3745-54-14 (A)(2)						
unknow onto the violation	sturbance of the waste or equipment by the ving or unauthorized entry of persons or livestock e active portion of a facility will not cause a n of the requirements Chapters 3745-54 to 3745- 3745-205 of the Administrative Code?	х			F-1		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
F-1b Security Procedures and Equipment OAC 3745-50-44 (A)(4), 3745-54-14 (B)						
If the owner/operator does not a provide justification for a waiver of these requirements, has he demonstrated that the facility has the following:	Х			F-1		
F-1b(1) <u>24-Hour Surveillance System:</u> OAC 3745-54-14 (B)(1)						
Does the facility demonstrate that it has a 24-hour surveillance system (e.g., television monitoring or surveillance by guards or facility personnel) that continuously monitors and controls entry onto the active portion of the facility?; or	x			F-1		
F-1b(2) <u>Barrier</u> : OAC 3745-54-14 (B)(2)(a)						
Does the facility demonstrate that it has an artificial or natural barrier (e.g., a fence in good repair or a fence combined with a cliff) that completely surrounds the active portion of the facility?; and	х			F-1		
F-1b(3) Means to Control Entry: OAC 3745-54-14 (B)(2)(b)						
Does the facility demonstrate that it has a means to control entry at all times through the gates or other entrances to the active portion of the facility (e.g., an attendant, television monitors, locked entrance or controlled roadway access to the facility)?	х			F-1		
F-1c <u>Warning Signs:</u> OAC 3745-54-14 (C)						

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
Unless a waiver is granted, does the facility have a sign with the legend, "Danger - Unauthorized Personnel Keep Out," posted at each entrance to the active portion of the facility and at other locations, in sufficient numbers to be seen from any approach to this active portion? Note that existing signs with a legend other than "Danger - Unauthorized Personnel Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.	х			F-1		
Is the legend legible from a distance of at least 25 feet?	х			F-1	-	
F-2 Inspection Schedule						
F-2a <u>General Inspection Requirements:</u> OAC 3745-50-44 (A)(5), 3745-54-15 (A), (B)(1) & (B)(2), 3745-54-33						<del>-</del> "
Does the owner/operator indicate the facility will develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment at his facility that are vital to prevent, detect, or respond to releases to the environment or threats to human health?	Х			F-2		
Does the inspection schedule demonstrate that all facility communication and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, is tested and maintained as necessary to assure proper operation at the time of an emergency?	х			TABLE F-1		
Does the owner/operator indicate this schedule will be kept at the facility?	х			F-2		

	YÉS	NO	ŅĄ	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
F-2a(I) <u>Types of Problems</u> : OAC 3745-54-15 (B)(3)						
Does the facility's inspection schedule identify the types of problems (e.g., malfunctions or deterioration) to look for during the inspection (e.g., inoperative sump pump, leaking fitting, eroding dike, and other such problems)?	х	į		TABLE F-1		
F-2a(2) <u>Frequency of Inspections</u> : OAC 3745-54-15 (B)(4)						
Does the owner/operator specify the frequency of inspection for items on the schedule?	х			TABLE F-1		
Is the frequency of inspection based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections?	х			F-1		
Are areas subject to spills, such as loading and unloading areas, inspected daily when in use?	х			TABLE F-1		
Does the inspection schedule identify inspection terms and frequencies for treatment, storage, and disposal of hazardous waste in containers, tanks, surface impoundments, land piles, and incinerators (as called for in OAC rules 3745-55-74, 3745-55-95, 3745-56-26, 3745-56-54, 3745-57-05, 3745-57-47, and 3745-57-92, where applicable)?	х			TABLE F-1		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the owner/operator define "weekly" in a manner consistent with existing DHWM guidance? (see 6/4/92 Memo from TAS; DHWM Technical Assistance Compendium)	х			F-2		
F-2a(3) Remedial Action: OAC 3745-54-15 (C)						
Does the owner/operator state that any deterioration or malfunction of equipment or structures revealed by inspections will be remedied in time to prevent an environmental or human health hazard?	х			F-2		
F-2a(4) <u>Inspection Logs:</u> OAC 3745-54-15 (D)						
Does the owner/operator state that all facility inspections will be recorded on a log or summary?	х			F-2		
Does the owner/operator state that these records will be kept at the facility for at least 3 years from the date of the inspection?	х			F-2		
Are example logs or summaries provided that indicate the following items will be recorded: date and time of the inspection, name of the inspector, a notation of observations made, and the date and nature of any repairs or other remedial actions?	х			F-2		
F-2b Specific Process Unit Inspections			_			
F-2b(1) <u>Container Inspections</u> : OAC 3745-50-44 (A)(5), 3745-55-74						

	YES	NO	NÁ	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the owner/operator demonstrate that all containers, containment systems, and container storage areas will be inspected weekly for leaks, spills and deterioration caused by corrosion or other factors?	Х			F-2		
F-2b(2) <u>Tank System Inspections</u> OAC 3745-50-44 (A)(5), 3745-55-95						
F-2b(2)(a) Tank System Overfilling Control Equipment: OAC 3745-55-95 (A)						
Did the owner/operator develop a schedule and demonstrate that it will be followed for inspecting overfill controls?			X			
F-2b(2)(b) Tank System External Corrosion and Releases OAC 3745-55-95 (B)(1)			_			
Does the owner/operator demonstrate that the above-ground portions of the tank system are inspected at least once each operating day to detect external corrosion or releases of waste?			x			
F-2b(2)(c) Tank System Monitoring and Leak Detection Ed OAC 3745-55-95 (B)(2)	uipmen	<b>t</b> :				
Does the owner/operator demonstrate that data gathered from monitoring and leak detection equipment (e.g., pressure and temperature gauges monitoring wells), where present, is inspected at least once each operating day to ensure that the tank is operated according to design specifications?			х			

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?			
F-2b(2)(d) Tank System Construction Materials and Surrounding Area: OAC 3745-55-95 (B)(3)									
Does the owner/operator demonstrate that the construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system (e.g., dikes) are inspected at least once each operating day to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation)?			х						
F-2b(2)(e) Tank System Cathodic Protection: OAC 3745-55-95 (C)			0.000	V					
If cathodic protection systems are present, did the owner/operator demonstrate that he will inspect the following aspects of these systems on the following schedules:	and the second s								
(1) confirmation of proper operation of the cathodic protection system within six months after installation and at least annually thereafter?, and			х						

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(2) confirmation that all sources of impressed current are inspected and/or tested, as appropriate, at least bimonthly?  Note: The practices described in the "National Association"						
of Corrosion Engineers (NACE)" standard, External corrosion on Metallic Buried, Partially Buried, or Submerged Liquid Storage Systems," and the "American Petroleum Institute (API)" publication 1632, "Cathodic Protection of Underground Petroleum Storage Tanks and Piping Systems," may be used, where applicable, as guidelines in maintaining and inspecting cathodic protection systems.			х			
F-2b(2)(f) Operating Record: OAC 3745-55-95 (D)						
Did the owner/operator demonstrate that it will document its tank inspections in the facility's operating record?			х			
F-2b(3) <u>Surface Impoundment Inspections:</u> OAC 3745-50-44 (A)(5), 3745-56-26 (A) & (B)						
F-2b(3)(a) Post-Construction Inspection: OAC 3745-56-26 (A)						
Did the owner/operator demonstrate that the liners and cover systems of the surface impoundment(s) at the facility will be or have been inspected for the following immediately after completing construction or installation:						
(1) synthetic liners and covers are inspected to ensure tight seams and joints and the absence of tears, punctures, or blisters?			х			

,	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(2) soil-based and admixed liners and covers are inspected for imperfections including lenses, cracks, channels, root holes, or other structural non-uniformities that may cause an increase in the permeability of the liner or cover?			х			
F-2b(3)(b) Operational Inspections: OAC 3745-56-26 (B)						
While the surface impoundment(s) are in operation, does the owner/operator demonstrate that they are inspected weekly and after storms for evidence of any of the following conditions:						
(1) deterioration, malfunctions, or improper operation of overtopping control systems;			х			
(2) sudden drops in the level of each impoundment's contents;			х			
(3) severe erosion or other signs of deterioration in the dikes or other containment devices?			х			
F-2b(4) Waste Pile Inspections OAC 3745-50-44 (A)(5); 3745-56-54	<del></del>					
F-2b(4)(a) Post-Construction Inspection: OAC 3745-56-54 (A)				## # !		
Did the owner/operator demonstrate that the liners and cover systems of the land pile(s) at the facility will be or have been inspected for the following immediately after completing construction or installation:						

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(1) synthetic liners and covers are inspected to ensure tight seams and joints and the absence of tears, punctures, or blisters?			х			
(2) soil-based and admixed liners and covers are inspected for imperfections including lenses, cracks, channels, root holes, or other structural non-uniformities that may cause an increase in the permeability of the liner or cover?			х			
F-2b(4)(b) Operational Inspections: OAC 3745-56-54 (B)						
While the land pile(s) are in operation, does the owner/operator demonstrate that they are inspected weekly and after storms for evidence of any of the following conditions:						
(1) deterioration, malfunctions, or improper operation of run-on and run-off control systems;			х			
(2) proper functioning of wind dispersal control systems, where present; and			х			
(3) presence of leachate in and proper functioning of leachate collection and removal systems, where present?			х			
F-2b(5) <u>Land Treatment Unit Inspections:</u> OAC 3745-50-44 (A)(5), 3745-56-73 (G)						
Does the owner/operator demonstrate that land treatment units will be inspected weekly and after storms to detect evidence of the following conditions:						

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(1) deterioration, malfunctions, or improper operation of run-on and run-off control systems; and			х			
(2) improper functioning of wind dispersal control measures?			х			
F-2b(6) <u>Landfill Inspections:</u> OAC 3745-50-44 (A)(5), 3745-57-05						
F-2b(6)(a) Post-Construction Inspection: OAC 3745-57-05 (A)						
Did the owner/operator demonstrate that the liners and cover systems of the landfill at the facility will be or have been inspected for the following immediately after completing construction or installation:						
(1) synthetic liners and covers are inspected to ensure tight seams and joints and the absence of tears, punctures, or blisters?; and			Х			
(2) soil-based and admixed liners and covers are inspected for imperfections including lenses, cracks, channels, root holes, or other structural non-uniformities that may cause an increase in the permeability of the liner or cover?			X			
F-2b(6)(b) Operational Inspections: OAC 3745-57-05 (B)						
While the landfill is in operation, does the owner/operator demonstrate that it is inspected weekly and after storms for evidence of any of the following conditions:	:		-			

	YES	NO	NA	Page	Notes - NOD Comment #	Include on Inspection Checklist?
(1) deterioration, malfunctions, or improper operation of run-on and run-off control systems;			х			
(2) proper functioning of wind dispersal control systems, where present; and			х			
(3) presence of leachate in and proper functioning of leachate collection and removal systems, where present?			х			
F-2b(7) Incinerator Inspections OAC 3745-57-47	-					
F-2b(7)(a) Incinerator and Associated Equipment Inspect OAC 3745-57-47 (B)	ion:					
Does the owner/operator demonstrate that the incinerator and associated equipment (pumps, valves, conveyors, pipes, etc.) are subjected to thorough visual inspections at least daily for leaks, spills, fugitive emissions, and signs of tampering?			х			
F-2b(7)(b) Incinerator Waste Feed Cut-off System and Ass OAC 3745-57-47 (C)	sociated	Alarm	Inspect	ions:		
Does the owner/operator demonstrate that the emergency waste feed cutoff system and associated alarms are tested at least weekly unless a demonstration has been made that the weekly frequency is unduly restrictive and that less frequent inspections will be adequate? At a minimum, operational testing must be conducted monthly.			х			
F-2b(7)(c) Operating Record: OAC 3745-57-47 (C)	<b>-</b>	-	-	-		

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
Does the owner/operator state that incinerator monitoring and testing data will be recorded in the operating record of the facility?			х			
F-2b(8) <u>Miscellaneous Unit Inspections:</u> OAC 3745-50-44 (A)(5), 3745-57-92						
Does the owner/operator demonstrate that its inspections of miscellaneous units at the facility comply with requirements of OAC 37455-57-91 and all other applicable inspection requirements?			х			
F-3 Exemption from or Documentation of Preparedness & Prevention Requirements OAC 3745-50-44 (A)(6), 3745-54-30 to 3745-54-37			_			
F-3a Justification for Exemption Request: OAC 3745-50-44	(A)(6)					
If the facility is requesting an exemption to any of the preparedness and prevention requirements of OAC 3745-54-30 to 3745-54-37, has it provided adequate justification to support the exemption?			х			
F-3b <u>Design and Operation of Facility:</u> OAC 3745-54-31						
Is the facility designed, constructed, maintained and operated to minimize the possibility of fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or constituents to air, soil or surface water which could threaten human health or the environment?	x			F-3 & F-4		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
F-3c Equipment Requirements: OAC 3745-54-32						
If the owner/operator has not requested an exemption to the preparedness and prevention requirements and the owner/operator manages waste that necessitates requiring this equipment, does the owner/operator describe the following emergency equipment present at the facility:				,		
F-3c(1) Internal Communications: OAC 3745-54-32 (A)						
(1) Internal communications or alarm system used to provide immediate emergency instruction (voice or signal) to facility personnel?	х			F-3		
F-3c(2) External Communications: OAC 3745-54-32 (B)						
(2) A device, such as telephone (immediately available at the scene of operations) or a hand held two-way radio, for summoning emergency assistance from local police departments, fire departments or state or local emergency response teams?	х			F-3		
F-3c(3) <u>Emergency Equipment:</u> OAC 3745-54-32 (C)						
(3) Portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas or dry chemicals), spill control equipment and decontamination equipment?	х	:		F-4		

	YES	NO	NA	Page #	Notes - NOD Comment #	include on Inspection Checklist?
F-3c(4) Water for Fire Control: OAC 3745-54-32 (D)				,		
(4) Water at adequate volume and pressure to supply water hose streams, foam, producing equipment, automatic sprinklers or water spray systems?	х			F-4		
F-3d Access to Communications or Alarm System: OAC 3745-54-34						
Does the facility demonstrate that all personnel involved in the pouring, mixing, spreading or other handling of hazardous waste will have immediate access to an internal alarm or emergency communication device (unless not required under OAC 3745-54-32)?	х			F-3		
F-3e <u>Aisle Space Requirement:</u> OAC 3745-54-35						
Does the facility demonstrate that it maintains sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment or spill control equipment to any area of facility operation in an emergency?	х			F-4		
If the facility is requesting a waiver of the aisle space requirements, does the application provide adequate demonstration that aisle space is not needed for any of these purposes?			х			

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
For flammable and combustible liquids, does the application indicate that aisle space of at least 3 feet will be maintained where necessary to provide access to doors, windows, or standpipe connection? (Boca National Fire Prevention Code, 1987 (F-2805.4.2.6.))			х			
F-3f Arrangements/Agreements with Local Authorities: OAC 3745-54-37						
Does the owner/operator demonstrate it has attempted to make the following arrangements/agreements with local authorities as necessary based on the type of waste handled at the facility and the need for the services of these organizations:	х			G-22		
F-3F(1) Arrangements with Police, Fire Departments and Emergency Response Teams: OAC 3745-54-37 (A)(1)	•					
(1) Arrangements to familiarize police, fire departments, and emergency response teams with the following aspects of the facility:						
a) Layout of the facility?;	х			G-23		
<ul> <li>b) Properties of the hazardous waste handled and associated hazards?;</li> </ul>	х			G-23		
<ul> <li>c) Places where facility personnel would normally be working?;</li> </ul>	х			G-23		
d) Entrances to and roads inside the facility? and;	Х			G-23		
c) Possible evacuation routes?	х			G-23		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
F-3f(2) Primary Emergency Authority: OAC 3745-54-37 (A)(2)						
(2) If more than one police or fire department may respond to an emergency at the facility, does the owner/operator document the agreements that designate the primary emergency authority to a specific police or specific fire department, and the agreements of other responders to provide support the primary emergency authority?	х			G-23		
F-3f(3) Arrangements with Ohio EPA OAC 3745-54-37 (A)(3)						
(3) Did the owner/operator specify the arrangements the facility has with Ohio EPA emergency response teams, emergency response contractors, and equipment suppliers?	х			G-11		
F-3f(4) Arrangements with Local Hospitals: OAC 3745-54-37 (A)(4)						
(4) Did the owner/operator specify the arrangements the facility has with local hospitals to familiarize them with the properties of hazardous waste handled at the facility and the types of injuries or illnesses that may result from fires, explosions, or releases at the facility?	х			G-23		
F-3f(5) Documenting Refusals: OAC 3745-54-37 (B)	,					

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(5) Where authorities have declined to enter into emergency arrangements/agreements has the owner/operator demonstrated that he will document the refusal in the facility operating record?			х			
F-4 Preventive Procedures, Structures, and Equipment OAC 3745-50-44 (A)(8)	,		,			
F-4a <u>Unloading Operations:</u> OAC 3745-50-44(A)(8)(a)						
Does the owner/operator describe the procedures, structures, or equipment used to prevent hazards in unloading operations (e.g., use of ramps or special forklifts)?	х			F-4		
F-4b <u>Run-off:</u> OAC 3745-50-44 (A)(8)(b)						
Does the owner/operator describe the procedures, structures or equipment used to prevent run-off from hazardous waste handling areas to other areas of the facility or environment, or to prevent flooding (e.g., berms, dikes, trenches)?	х			F-5		
F-4c Water Supplies: OAC 3745-50-44 (A)(8)(c)						
Does the owner/operator describe the procedures, structures, or equipment used to prevent contamination of water supplies?	х			F-5		
F-4d Equipment and Power Failure: OAC 3745-50-44 (A)(8)(d)						

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
Does the owner/operator describe the procedures, structures, or equipment used to mitigate the effects of equipment failure and power outage?	х			F-5		
F-4e Personnel Protection Equipment: OAC 3745-50-44 (A)(8)(e)						
Does the owner/operator describe the procedures, structures, or equipment used to prevent undue exposure of personnel to hazardous waste (e.g. protective clothing)?	х			F-5		
F-5 Prevention of Reaction of Ignitable, Reactive and Incompatible Wastes	,					
F-5a Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste: OAC 3745-50-44 (A)(9), 3745-54-17 (A)						
If the facility handles ignitable, reactive, or incompatible wastes, does the owner/operator describe the precautions taken by a facility to prevent actual ignition or reaction of these wastes?	x			F-5		
Do these precautions include separation from sources of ignition such as open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., heat-producing chemical reactions), and radiant heat?	х			F-6		
Does the owner/operator demonstrate that while ignitable or reactive waste is being handled, smoking and open flames are confined to specially designated locations?	х			F-5		

		YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
con	es the facility have "NO SMOKING" signs spicuously placed wherever a hazard exists from table or reactive waste?	х			F-6		
F-5	General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste: OAC 3745-50-44 (A)(9), 3745-54-17 (B)	ve_					
read or in own	e facility treats, stores, or disposes of ignitable or ctive waste, or accidentally mixes incompatible waste accompatible wastes and other materials, does the ler/operator demonstrate he will take precautions to vent reactions which:						
(1)	Generate extreme heat or pressure, fire or explosions, or violent reactions?;	х			F-6		
(2)	Produce uncontrolled flammable fumes, dusts, or gases in sufficient quantities to threaten human health or the environment?;	х			F-6		
(3)	Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?;	х			F-6		
(4)	Damage the structural integrity of the device or facility?;	х			F-6		
	By similar means threaten human health or the	х			F-6		

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
Does the owner/operator demonstrate compliance with the general requirements for ignitable, reactive, or incompatible waste using any of the following documentation:						
(1) References to published scientific or engineering literature?;	х			C-9		
(2) Date from trial tests (e.g. bench scale or pilot scale tests)?;	х			C-9		
(3) Waste analysis (as specified in OAC 3745-54-14)?;	Х			C-9		
(4) Results of the treatment of similar wastes by similar treatment processes and under similar operating conditions?	х			C-9		
F-5d Management of Ignitable or Reactive Wastes in Conta OAC 3745-50-44 (C)(1)(c), 3745-55-76	iners:					
Did the owner/operator provide sketches, drawings, or data demonstrating that containers storing ignitable or reactive waste are located at least 15 meters (50 feet) from the facility's property line?	х			F-6		
F-5e Management of Incompatible Wastes in Containers: OAC 3745-50-44 (C)(1)(d), 3745-55-77		•				

and the second s	YES	NO	NA	Page #	Notes - NOD Comment #	include on Inspection Checklist?
Does the owner/operator describe procedures used at the facility to ensure that incompatible wastes or incompatible wastes and materials (see appendix to OAC 3745-55-99) are not placed in the same containers or in an unwashed containers that previously held incompatible waste unless the facility takes the precautions to prevent the reactions detailed in OAC 3745-54-17 (B)?	х			F-6		
Did the owner/operator provide sketches, drawings, or data demonstrating that storage containers holding hazardous waste that is incompatible with any waste or other materials that are stored nearby in other containers, piles, open tanks, or surface impoundments will be separated from the other incompatible waste or material or protected from them by means of a dike, berm, wall or other device?	х			F-6		
F-5f Management of Ignitable or Reactive Wastes in Tank OAC 3745-50-44 (C)(2)(j), 3745-55-98	Systems	i.				
Did the owner/operator describe the operational procedures used for storing ignitable or reactive wastes in tank systems that includes specific information on at least one of the following:						
(1) how the waste is treated , rendered, or mixed before or immediately after the placement in the tank so that it is no longer considered ignitable or reactive and takes precautions to prevent reactions detailed in OAC 3745-54-17 (B)?; or			х			

	YES	NO	NA	Page	Notes - NOD Comment #	include on inspection Checklist?
(2) how the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to react or ignite?; or			х	:		
(3) that the tank is used solely for emergencies?  Note: If the owner/operator does not meet at least one of the conditions in numbers (1), (2) or (3), then ignitable or reactive waste must not be placed in tank systems.			х			
Did the owner/operator describe the manner in which ignitable or reactive waste in tanks will be stored or treated to maintain protective distances between the tank(s) and any public ways, streets, alleys, or adjoining property lines than can be built upon as required in Tables 2-1 to 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code (1996)", which is incorporated by reference in rule 3745-50-11 of the Administrative Code?			х			
F-5g Management of Incompatible Wastes in Tank Systems OAC 3745-50-44 (C)(2)(j), 3745-55-99	<u>3:</u>					
Did the owner/operator demonstrate that incompatible wastes or incompatible wastes and materials (as detailed in the appendix to this rule) are not stored in the same tank or in an unwashed tank that previously held an incompatible waste or material unless precautions to prevent reactions detailed in OAC 3745-54-17 (B) are taken?			Х			

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
F-5h Management of Ignitable or Reactive Wastes in Surface Impoundments: OAC 3745-50-44 (C)(3)(g), 3745-56-29						
Did the owner/operator demonstrate that ignitable or reactive wastes are not placed in the surface impoundment unless all land disposal restriction requirements are met and						
(1) the waste is treated, rendered or mixed before or immediately after placement in the impoundment so that the resulting waste no longer meets the definition of ignitable or reactive waste and precautions are taken to prevent the reactions detailed in OAC 3745-54-17 (B)?; or			X			
(2) the waste is managed in such a way that protects it from any material or conditions which may cause it to ignite or react?; or			х			
<ul> <li>(3) the surface impoundment is used solely for emergencies?</li> <li>Note: If the owner/operator does not meet at least one of the conditions in numbers (1), (2) or (3), then ignitable or reactive waste must not be placed in surface impoundments.</li> </ul>			х			
F-5i Management of Incompatible Wastes in Surface Impo	undmen	<u>ts:</u>				

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
Did the owner/operator demonstrate that incompatible wastes or incompatible wastes and materials (as detailed in the appendix to OAC 3745-55-99) are not placed in the surface impoundment unless precautions to prevent reactions detailed in OAC 3745-54-17 (B) are taken?			х			
F-5j Management of Ignitable or Reactive Wastes in Waste OAC 3745-50-44 (C)(4)(f), 3745-56-56	Piles:					
Did the owner/operator demonstrate that ignitable or reactive wastes are not placed in the waste pile unless all land disposal restrictions are met and:						
(1) addition of the waste to an existing pile results in the waste no longer meeting the definition of ignitable or reactive waste and precautions are taken to prevent the reactions detailed in OAC 3745-54-17 (B)?; or			х			
(2) the waste is managed in such a way that protects it from any material or conditions which may cause it to ignite or react?		ì	х			
F-5k Management of Incompatible Wastes in Waste Piles: OAC 3745-50-44 (C)(4)(g), 3745-56-57						
Did the owner/operator demonstrate that incompatible wastes or incompatible wastes and materials (as detailed in the appendix to OAC 3745-55-99) are not placed in the same pile unless precautions to prevent reactions detailed in OAC 3745-54-17 (B) are taken?			х		·	

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Did the owner/operator demonstrate that a pile of hazardous waste that is incompatible from any waste or material stored nearby in other containers, piles, open tanks, or surface impoundments will be separated from the other materials or protected from them by means of a dike, berm, wall, or other device?			Х			
Did the owner/operator demonstrate that hazardous waste will not be piled on the same base where incompatible wastes or materials were previously piled, unless the base has been decontaminated sufficiently to prevent reactions detailed in OAC 3745-54-17 (B)?			Х			
F-5I Management of Ignitable or Reactive Wastes Placed in Land Treatment Units: OAC 3745-50-44 (C)(5)(g), 374						
Did the owner/operator demonstrate that ignitable or reactive wastes are not applied to the treatment zone unless all land disposal restrictions are met and:						
(1) the waste is immediately incorporated into the soil so that the resulting waste or mixture no longer meets the definition of ignitable or reactive waste and precautions are taken to prevent the reactions detailed in OAC 3745-54-17 (B)?; or			х			
(2) the waste is managed in such a way that protects it from any material or conditions which may cause it to ignite or react?			х			
F-5m Management of Incompatible Wastes Placed in Land Treatment Units: OAC 3745-50-44 (C)(5)(h),	3745-5	L 6-82	l	L	L	

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
Did the owner/operator demonstrate that incompatible wastes or incompatible wastes and materials (as detailed in the appendix to OAC 3745-55-99) are not placed in the same treatment zone unless precautions to prevent reactions detailed in OAC 3745-54-17(B) are taken?			X			
F-5n Management of Ignitable or Reactive Wastes Placed in Landfills: OAC 3745-50-44 (C)(7)(f), 374	5-57-12					
Did the owner/operator demonstrate that ignitable or reactive wastes are not placed in a landfill unless all land disposal restrictions are met and:						
(1) the resulting waste or mixture no longer meets the definition of ignitable or reactive waste and precautions are taken to prevent the reactions detailed in OAC 3745-54-17 (B)?; or			х			
(2) ignitable waste in containers to be landfilled are protected from any material or conditions that may cause them to ignite? At a minimum containers must be: non-leaking and carefully handled and placed so as to avoid heat, sparks, rupture; covered daily with soil or other non-combustible material to minimize the potential for ignition, and; must not be disposed in any cells that contain or will contain other wastes which may generate heat sufficient to cause ignition of the waste?			х			

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Did the owner/operator demonstrate that incompatible waste or incompatible wastes and other materials will not be placed in the same landfill cell unless the facility takes the precautions to prevent the reactions detailed in OAC 3745-54-17 (B)?			х			

## **RCRA Part B Review Checklist**

Section G

Contingency Plan General Information

## PART B REVIEW CHECKLIST

## SECTION G - CONTINGENCY PLAN GENERAL INFORMATION Last updated: May 2005

Facility/ID #	ОН7890008983	Date	07/27/2010
Reviewer		DO	

Relevant Guidance Documents: Guidance Concerning Contingency Plan Implementation and Incident Reporting - December, 1998

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
G OAC 3745-54-51, 3745-54-52(B) or 3745-65-51, 3745-65-52(B)	***					
Did the permittee provide a copy of the Contingency Plan (or Spill Prevention Control and Countermeasures (SPCC) Plan amended for hazardous waste management)?	х			G-1		
Are all documents cited in the contingency plan located in the body of the contingency plan or in an attachment section to the contingency plan?	x			G-1		
Is the description of the facility, personnel, equipment and associated structures up to date with the current facility status?	х			G-31 to G-58		
Is the plan written in present tense including possible updates?	х			G-3		
Are all rule citations in the contingency plan correct and up to date?	х			G-1		
Does the contingency plan include material that would be considered a mod? (OAC 3745-54-54)		х				
G-1a <u>Floodplains</u> OAC 3745-54-18(B)						

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
If the facility is in a one-hundred-year floodplain, does the contingency plan state that the facility must be designed, constructed, operated, and maintained to prevent washout of any hazardous waste by a one-hundred-year flood unless the owner or operator can demonstrate that:  [Note: "washout" means the movement of hazardous waste from the active portion of the facility as a result of flooding, "one-hundred-year floodplain" means any land area which is subject to a one percent or greater chance of flooding in any given year from any source.]			x			
(1) procedures are in effect which will cause the waste to be removed safely, before flood waters can reach the facility, to a location where the wastes will not be vulnerable to floodwaters; or			Х			
(2) for existing surface impoundments, waste piles, land treatment units, landfills, and miscellaneous units, no adverse effects on human health or the environment will result if washout occurs, considering:			х			
(a) the volume and physical and chemical characteristics of the waste in the facility;		:	х			
(b) the concentration of hazardous constituents that would potentially affect surface waters as a result of washout;			х			
(c) the impact of such concentrations on the current or potential uses of and water quality standards established for the affected surface waters; and			х			

	YES	NO	NA	Page #	Notes - NOD Comment #	include on Inspection Checklist?
(d) the impact of hazardous constituents on the sediments of affected surface waters or the soils of the one-hundred-year floodplain that could result from washout.  [Note: the location where wastes are moved must be a facility which is either permitted by the state of Ohio, or authorized to manage hazardous waste by a state with a hazardous waste management program authorized under 40 CFR Part 271.]			Х			
G-1b General Information: OAC 3745-54-52			•			
In the contingency plan, does the facility provide:						
(1) the facility name?	Х			G-3		-
(2) the facility location?	Х			G-3		
(3) the operator name?	Х			G-3		
(4) a site plan?, and	Х			G-4		
(5) a description of facility operations?	Х			G-3		
Does the contingency plan describe the actions facility personnel must take to comply with rules 3745-54-51 (Purpose) and 3745-54-56 (Emergency Procedures) of the Administrative Code in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility?	х			G-4		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the contingency plan include names, addresses, office and home phone numbers of all persons qualified to act as emergency coordinator?	х			TABLE G-1		
Where more than one person is listed, is one person listed as the primary emergency coordinator, with others listed in the	х	,		TABLE G-1		
order in which they will assume responsibility as alternates?  Does the contingency plan include the duties of primary and alternate coordinators?	х			G-6		
Does the contingency plan include a statement of authorization for the emergency coordinator to commit the resources necessary to implement the plan?	х			G-6		
Have employees, who are listed as able to act as the emergency coordinator in the event that the primary or secondary emergency coordinator cannot be reached, been authorized to commit the resources necessary to implement the contingency plan?	х			G-6		
Does the contingency plan state that an emergency coordinator will always be either on-site or on call?	х			G-6		
Does the plan state that the emergency coordinator must be required to be familiar with all aspects of the plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility and the facility layout?	х			G-6		
G-3 Implementation: OAC 3745-54-52 (A), 3745-54-51		•		•		

OAC 3745-54-52 (A), 3745-54-51

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on
	·		,			Inspection Checklist?
Does the contingency plan describe when the contingency plan will be implemented (immediately, whenever there is a fire, explosion or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?) Does the plan provide information about the scenarios under which the contingency plan will be implemented (e.g. quantities or waste streams involved)? For example does the plan define a large spill or fire that would require implementation of the contingency plan?	х			G-7		
Does it describe <u>how</u> the contingency plan will be implemented?	х			G-7	<del></del> "	
G-4 Emergency Response Procedures						
G-4a Notification : OAC 3745-54-56 (A) & (D)					···	
Does the contingency plan describe the methodology for immediate notification of facility personnel?	х			G-10		
Does the contingency plan describe the methodology for immediate notification of necessary state or local agencies with designated response roles?	х			G-11		
Does the plan describe the information that will be provided to the Ohio EPA and local authorities when a notification is made?	х			G-11		
Will the notification be made immediately upon determining the emergency situation has or may cause harm or hazard to human health and the environment (on- or off-site)?	х			G-10		

, and the second se	YES	NO	NA	Page #	Notes - NOD Comment#	Include on Inspection Checklist?
In the event evacuation is necessary, does the plan indicate that the emergency coordinator will immediately contact local authorities, and be available to help those officials decide whether evacuation is necessary?	х			G-11		
Is the person or persons responsible for each notification identified?	Х			G-10		
If the facility uses a specific emergency notification report	х			FIG.		
form, is a copy or example of that report form provided in the contingency plan?				G-3		
Does the plan require the facility to notify the director and appropriate local authorities that the facility is in compliance with OAC 3745-54-56 (H) before operations are resumed in the affected area(s) of the facility?	х			G-19		
Does the contingency plan identify the authorities to be notified in each of the above cases?	Х			G-11		
G-4b Identification of Hazardous Materials: OAC 3745-54-56 (B)						
Does the contingency plan describe procedures for identification of hazardous materials involved in the emergency?	Х			G-12		
Does the contingency plan indicate that if possible the facility operating record will be consulted to determine which wastes are stored/treated/disposed in the affected area(s)?	х			G-12		
Does the plan identify areas that pose the most threat and the potential dangers that exist in those areas?	х			G-12		

,	YES	NO	ŇÁ	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Are facility staff involved in identifying the affected materials properly trained to perform this evaluation? The permit reviewer should check the personnel training section to ensure consistency with this requirement.	х		-	G-12		
G-4c <u>Assessment:</u> OAC 3745-54-56 (C) & (D)		,				
Does the contingency plan describe the criteria used to assess the possible hazards to human health and the environment as a result of a <u>fire</u> ?	Х			G-7		
Does the contingency plan describe the criteria used to assess the possible hazards to human health and the environment as a result of a <u>release?</u>	х			G-7		
Does the contingency plan describe the criteria used to assess the possible hazards to human health and the environment as a result of an explosion?	Х			G-7		
Does the plan require assessment of the effects of any toxic, irritating, or asphyxiating gases that may be generated or the effects of any hazardous surface water run-off from water or chemical agents that may be used to control fire and heat-induced explosions?	Х			G-12		
Does the contingency plan describe the criteria used to assess the possible hazards to human health and the environment that would result in the need for evacuation and notification of authorities?	х	i		G-12		
G-4d Control Procedures: OAC 3745-54-52 (A)						
Does the contingency plan specify control procedures to be taken in the event of a fire?	Х			G-16		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the contingency plan specify control procedures to be taken in the event of <u>an explosion?</u>	Х			G-14		
Does the contingency plan specify control procedures to be taken in the event of <u>a release?</u>	Х			G-14		
Do these control procedures include, if necessary, the setting up of protective zones (hot, warm, cold, decontamination, etc.)	х	1		G-15		
If necessary, does the contingency plan describe the closing of storm drains during a spill, fire or explosion event?			х			
G-4e Prevention of Recurrence or Spread of Fires, Explosions, or Releases: OAC 3745 54-56 (E) & (F)						
Does the contingency plan describe the necessary steps to be taken ensure that fires do not occur, reoccur or spread to other hazardous waste at the facility?	х			G-17		
Does the contingency plan describe the necessary steps to be taken to ensure that explosions do not occur, reoccur or spread to other hazardous waste at the facility?	х			G-17		
Does the contingency plan describe the necessary steps to be taken to ensure that releases do not occur, reoccur or spread to other hazardous waste at the facility?	х			G-17		
Does the contingency plan state that the measures taken to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers?	х			G-17		

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
Does the contingency plan state that if the facility stops operations in response to a fire, explosion, or release the emergency coordinator will monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes or other equipment whenever this is appropriate?	х			G-17		
G-4f Storage and Treatment of Released Material: OAC 3745-54-56 (G)						
Does the contingency plan provide for treatment, storage, or disposal of any material that results from a release, fire, or explosion at the facility?  Note: Unless the owner or operator can demonstrate, in accordance with paragraph (C) or (D) of OAC Rule 3745-51-03, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage such waste in accordance with all applicable requirements of Chapters 3745-52, 3745-53, 3745-54 to 3745-57, and 3745-218.	х			G-17		
G-4g <u>Incompatible Waste:</u> OAC 3745-54-56 (H)(1)						
Does the contingency plan describe provisions for prevention of incompatible waste from being treated, stored, or located in the affected areas until clean-up procedures are completed?	х			G-18		
G-4h Post-Emergency Equipment Maintenance: OAC 3745-54-56 (H)(2)						
Does the contingency plan describe procedures for ensuring that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed?	х			G-19		

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	YES	NO	NA	Page #	Notes - NOD Comment#	Include on Inspection Checklist?
Does the contingency plan specify that if the release was from the tank system the owner/operator will, within 24 hours after detection of the leak, or if the owner/operator demonstrates that it is not possible, at the earliest practicable time, remove as much of the waste as necessary to prevent further release of hazardous waste to the environment and to allow inspection and repair of the tank system to be performed?			х			
In the event the material was released to a secondary containment system, does the contingency plan specify that all released materials will be removed within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment?			х			
Does the contingency plan specify after a release to the secondary containment from a tank, that decontamination of the area will occur in order to return the tank to service?			х			
G-4j(3) Containment of Visible Releases: OAC 3745-55-96 (C)						
Does the contingency plan specify that a visual inspection of the release will immediately be conducted?			х			
Does the contingency plan demonstrate that based on the visual inspection, further migration of the leak or spill to soils and surface water will be prevented?			х			
Does the contingency plan indicate that any visible contamination of the soil or surface water will be removed and properly disposed?			х			
Does the contingency plan indicate that confirmatory sampling will occur to determine that all contaminated media have been removed to clean levels?			х			

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
G-4j(4) Notifications, Reports: OAC 3745-55-96 (D)(1) & (2); 3745-54-56 (I)						
Does the contingency plan state that any release from the tank system to the environment (except a leak or spill that is less than or equal to one pound and immediately contained and cleaned up) will be reported to the Director within 24 hours of its detection?			х			
Does the contingency plan describe how the director and the appropriate local authorities will be notified that the facility is in compliance with paragraph (H) of rule 3745-54-56 before operations are resumed in the affected areas of the facility?			Х			
G-4j(5) Provision of Secondary Containment, Repair, or Closure: OAC 3745-55-96 (E) & (F)						
Does the contingency plan demonstrate, if the release has not damaged the integrity of the system, that the released waste will be removed and repairs, if necessary, will be made prior to returning the system to service?			Х			
Does the contingency plan demonstrate, if the source of the release was a leak to the environment from a component of a tank system without secondary containment, secondary containment (satisfying OAC 3745-55-93) will be provided for the component from which the leak occurred, before the component can be returned to service, unless the component is an aboveground portion of a tank system that can be inspected visually?			х			

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
If the source is an aboveground component that can be inspected visually, and the repair is a major repair (e.g., installation of an internal liner, repair of a ruptured pimary containment or secondary containment vessel), does the contingency plan demonstrate that the system will not be returned to service without a certification by an independent, qualified, registered, professional engineer that the repaired system is capable of handling hazardous wastes without release for the intended life of the system?			х			
If a component is replaced to comply with the requirements of the above subparagraph, does the contingency plan demonstrate that the component will satisfy the requirements for new tank systems or components in OAC 3745-55-92 and 3745-55-93?			x			
Additionally if a leak has occurred in any portion of a tank system component that is not readily accessible for visual inspection (e.g., the bottom of an inground or onground tank) does the contingency plan demonstrate that the entire component will be provided with secondary containment in accordance with section OAC 3745-55-93 prior to being returned to use?			х			
G-4k Surface Impoundment Spills and Leakage	<b></b>					<u> </u>
G-4k(1) Emergency Repairs: OAC 3745-56-27 (A)						
Does the contingency plan describe the procedures to be used for removing a surface impoundment from service when the level of the liquid in the impoundment suddenly drops and the drop is not known to be caused by changes in the flow into or out of the impoundment or when the dike leaks?			х			

	YES	, NO	NĄ	Page #	Notes - NOD Comment #	include on inspection Checklist?			
G-4k(1)(a) Stopping Waste Addition: OAC 3745-56-27 (B)(1)									
Does the contingency plan state procedures for stopping waste additions to the impoundment?			х						
G-4k(1)(b) Containing Leaks: OAC 3745-56-27 (B)(2)									
Does the contingency plan state procedures for containing surface leakage that has occurred or is occurring?			х						
G-4k(1)(c) <u>Stopping Leaks:</u> OAC 3745-56-27 (B)(3)									
Does the contingency plan state procedures for stopping the leak?			х						
G-4k(1)(d) Preventing Catastrophic Failure: OAC 3745-56-27 (B)(4)									
Does the contingency plan state procedures for stopping or preventing catastrophic failure?		:	х						
G-4k(1)(e) Emptying the Impoundment: OAC 3745-56-27 (B)(5)									
Does the contingency plan procedures for emptying the impoundment, if necessary (e.g. if a leak cannot be stopped)?			х						
G-4k(1)(f) Notification of the Director: OAC 3745-56-27 (B)(6)	G-4k(1)(f) Notification of the Director: OAC 3745-56-27 (B)(6)								
Does the contingency plan state that the facility will submit written notification to the Director within seven days after the problem was detected?			х						

Part B Review Checklist - Section G Facility OH7890008983 Page 15

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
G-4k(2) <u>Certification:</u> OAC 3745-56-27 (D)(1), 3745-56-26 (C)						
Does the contingency plan specify the procedure which will be followed for recertifying the dike's structural integrity, in the event the impoundment is removed from service as a result of actual or imminent dike failure?			х			
G-4k(3) Emergency Repairs as a Result of Sudden Drop: OAC 3745-56-27 (D)(2)						
Does the contingency plan specify the procedure, which will be followed in the event the impoundment is removed from service as the result of a sudden drop in the liquid level, for the installation of a liner (in compliance with 3745-56-21) for any existing portion of the impoundment?			х			
Does the contingency plan specify the procedure, which will be followed in the event the impoundment is removed from service as the result of a sudden drop in the liquid level, for the certification by a qualified engineer for other than existing portions of the impoundment?			х			
G-5 Emergency Equipment: OAC 3745-54-52 (E)						
Does the contingency plan include a list of all emergency equipment at the facility, including, but not limited to, fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment?	х			G-20		
Does the contingency plan describe the location, specifications, and capabilities of the emergency equipment?	х			G-20		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the contingency plan describe chemicals or other materials used to neutralize or absorb spills? If so are those chemicals and materials compatible with the hazardous waste?	х			G-18 & G-19		
Does the plan include a statement that information will be updated?	х	:		G-2		
The permit reviewer may need to review the preparedness and prevention section to ensure that changes in the contingency plan (or the original submittal) match the contingency plan submittal for the following:						
(1) Does the preparedness and prevention section list all the emergency equipment listed in the contingency plan?, and	х			TABLE G-2		
(2) Does the preparedness and prevention plan include a schedule for inspection and maintenance of the emergency equipment listed in the contingency plan?	х			G-20		
G-6 <u>Coordination Agreements:</u> OAC 3745-54-52 (C), 3745-54-37	•					•
When more than one police and fire department may respond to an emergency, does the contingency plan describe the agreements designating primary emergency authority to a specific police and specific fire emergency department and agreements with any others to provide support to the primary emergency authority?	х			G-23		
Does the contingency plan describe arrangements with Ohio EPA emergency response teams, emergency response contractors, and equipment suppliers?			х			

Part B Review Checklist - Section G Facility <u>OH7890008983</u> Page 17

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Does the contingency plan state that arrangements have been made with local hospitals to familiarize them with the properties of hazardous waste handled at the facility and types of injuries or illnesses which could result from fires, explosions, or releases at the facility?	х			G-23		
Does the contingency plan state that the facility will document refusal to enter into a coordination agreement?			Х			
G-7 <u>Evacuation Plan:</u> OAC 3745-54-52 (F)						
Does the contingency plan describe signal(s) to be used to begin evacuation?	х			G-24		
Does the contingency plan describe planned and alternate evacuation routes?	Х			FIG. G-4		
G-8 Required Reports: OAC 3745-54-56 (J)						
Does the plan state that the time, date, and details of any incident that requires implementing the contingency plan must be noted in the operating record of the facility?	х			G-27		
Does the plan state that a report will be submitted to the director within 15 days after an incident that requires implementation of the contingency plan, and will contain the following information:						
(1) name, address, and telephone number of the owner or operator?	х			G-27		
(2) name, address, and telephone number of the facility?	Х			G-27		
(3) date, time and type of incident?	Х			G-27		

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
(4) name and quantity of material(s) involved?	Х			G-27		
(5) the extent of any injuries?	Х			G-27		
(6) an assessment of actual or potential hazards to human health or the environment?	Х			G-27		
(7) estimated quantity and disposition of recovered material that resulted from the incident?, and	Х			G-27		
(8) other information as may be required by the director?	Х			G-27		
The permit reviewer should check to determine that the operating record will describe the maintenance of records identifying the time, date, and details of an emergency incident.						
G-9 Copies of the contingency plan OAC 3745-54-53:						
Does the plan include provisions for maintaining a copy of the contingency plan at the facility and for distributing copies to all local police departments, fire departments, hospitals, Ohio EPA, and local emergency response teams?	х			G-2		
G-10 Amendment of the contingency plan OAC 3745-54-54						
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when the facility's Ohio hazardous waste permit is revised?	х			G-3		
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when the plan fails in an emergency?	х			G-3		

Part B Review Checklist - Section G Facility <u>OH7890008983</u> Page 19

	YES	NO	NA	Page #	Notes - NOD Comment#	include on inspection Checklist?
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when the facility changes in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or that changes the response necessary in an emergency?	х			G-3		
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when a change is required by the director?	х			G-3		
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when the list of emergency equipment coordinators changes?	х			G-3		
Is it stated that the contingency plan will be immediately amended (in accordance with OAC 3745-50) when the list of emergency equipment changes?	х			G-3		

# RCRA Part B Review Checklist Section H Personnel Training

#### PART B REVIEW CHECKLIST

### SECTION H - PERSONNEL TRAINING Last updated: May 2005

Facility/ID #	ОН7890008983	Date	07/28/2010
Reviewer		DO	

Relevant Guidance Documents: None

	YES	NO	NA	Page #	Notes - NOD Comment #	include on inspection Checklist?
H-1a <u>Outline of the Training Program:</u> OAC 3745-50-44 (A)(12), 3745-54-16 (A)(1)						
Did the owner/operator provide an outline of both the introductory and continuing training programs used at the facility to prepare personnel to operate or maintain the facility in a safe manner, and to perform their duties in a way to ensure the facility's compliance with the hazardous waste facility standards?	х			H-1		
Did the owner/operator include a brief description on how training will be designed to meet actual job tasks? Note that on-the-job training may be used to comply with these requirements.	х			H-1		
H-1b <u>Training Director:</u> OAC 3745-54-16 (A)(2)						
Did the owner/operator demonstrate that the training program is directed by a person trained in hazardous waste management procedures? Minimum training for the training director may include OSHA Hazardous Waste Operations and Emergency Response (29 CFR 1910.120 (c)(7)(e)).	х			H-1		
H-1c Relevance of Training to Job Position: OAC 3745-54-16 (A)(2)						

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Did the owner/operator demonstrate that the training program provides facility personnel with instruction on hazardous waste management procedures (including contingency plan implementation) that are relevant to the positions they hold?	х			H-2		
H-1d Emergency Response Training: OAC 3745-54-16 (A)(3)						
Did the owner/operator demonstrate that the training program is designed to ensure that facility personnel are able to respond effectively to emergencies and are familiar with emergency procedures, emergency equipment, and emergency systems?	х			H-2		
Does the facility's training program include instruction in the following areas (as applicable):						
(1) procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment?	х			H-1		
(2) key parameters for automatic waste feed cut-off systems?	х			H-1		
(3) communications or alarm systems?	х			H-1		
(4) response to fires or explosions?	х			H-1		
(5) response to groundwater contamination incidents?	х			H-1		
(6) shutdown of operations?	Х			H-1		

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·	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Did the owner/operator demonstrate that training has been and will continue to be successfully completed by facility personnel within six months of their employment or assignment to the facility or transfer to a new position within the facility, whichever is later?	х			H-2		
Did the owner/operator document that employees will not work in unsupervised positions until they have completed the training requirements?	х			H-2		
Did the owner/operator provide a training matrix or other tracking form that demonstrates that the training requirements are tracked at the facility to ensure that each person receives the training relevant to their position in a timely manner (Paragraphs (B) and (C) of OAC 3745-54-16)? This matrix should include each employee's start date and dates required training is completed.	х			TABLE H-1		
H-3 <u>Training Frequency:</u> OAC 3745-54-16 (C)						
Did the owner/operator demonstrate that facility personnel have and will continue to take part in an annual review of the hazardous waste training program?	х			H-2		
H-4 <u>Training Records and Documents</u> OAC 3745-54-16 (D) & (E)						
H-4a <u>Job Titles:</u> OAC 3745-54-16 (D)(1)						
Did the owner/operator provide job titles for each position at the facility that is involved with hazardous waste management?	х			TABLE H-1		

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Did the owner/operator provide evidence that the names of the employees filling each of these positions is kept on record at the facility?	х			H-2		
H-4b <u>Job Descriptions;</u> OAC 3745-54-16 (D)(2)						
Did the owner/operator provide written job descriptions for each				TABLE		
position at the facility involved with hazardous waste management?	Х			H-1		
Do the job descriptions include the requisite skill, education, or				TABLE		
other qualifications, and other duties of employees assigned to each position consistent to the degree of specificity of similar position descriptions at the facility?	х			H-1		
H-4c <u>Training Descriptions:</u> OAC 3745-54-16 (D)(3)						
Did the owner/operator state that a written description of the type				TABLE		
and amount of introductory and continuing training that will be given to each person filling a position related to hazardous waste management at the facility will be kept on record at the facility?	Х			H-1		
H-4d <u>Training Records:</u> OAC 3745-54-16 (D)(4) & (E)						
Has the owner/operator demonstrated that it will maintain records to document that the training or job experience has been given to or completed by facility personnel?	х			H-2		

Part B Review Checklist - Section H Facility OH7890008983 Page 5

	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
Did the owner/operator state that training records on current personnel will be kept until closure of the facility, and that training records on former employees will be kept for at least 3 years from the date the employee last worked at the facility?	х			н-2		
[Comment: Owners and operators shall submit with "Part B" of the permit application an outline of the training program used (or to be used) at the facility and a brief description of how the training program is designed to meet actual job tasks.]						

## **RCRA Part B Review Checklist**

**Section J** 

**Corrective Actions** 

#### PART B REVIEW CHECKLIST

#### **SECTION J - CORRECTIVE ACTIONS**

Last updated: May 2005

Facility/ID #	OH7890008983	i de la companya de l	Date	<b>07/28/2</b> 010
Reviewer			DO	

The application should contain information as required by OAC 3745-50-44 (D). However, this information can be provided by referencing the appropriate document (e.g. RFI, CMS, etc.). This section of the checklist asks questions to help the permit writer complete the draft permit. If US EPA has been regulating corrective actions in the past the permit writer must contact US EPA to determine the transition point, i.e., the point that Ohio will assume corrective action oversight responsibilities.

Relevant Guidance Documents - Ohio EPA Corrective Action Plan (CAP) - http://epainte.gov/portals/32/pdf/theplan.pdf, Corrective Action Handbook - http://epaintra.epa.state.oh.us/dhwm/pdf/CAHandbooksune09.pdf

	YES	NO	NA	Page #	Notes - NOD Comment#	include on inspection Checklist?
Unit Description OAC 3745-50-44 (D)				<b>E</b>	For corrective action documents referenced in the application list the document name and date as well as page number.	
Note: The following information can be incomplicated into the application by reference to a document submitted by the facility (e.g. RFA, RFI, etc.)						
(1) For each waste unit does the application contain the following:						
a) The location of the unit on the topographic map (in accordance with OAC 3745-50-44 (A)(19))?	х				*DOCC	
b) A designation of the type of unit?	х				DOCC	

\*DESCRIPTION OF CURRENT CONDITIONS

QUADRANT I DOCC SEPT 1990
QUADRANT II DOCC DEC 1990
QUADRANT III DOCC NOV 1991
QUADRANT IV DOCC DEC 1992

		the contribution of the co							
,			YES	NO	NA	Page #	Notes - NOD Comment#	Include on Inspection Checklist?	
	c)	General dimensions and structural description (suppling any available drawings)?	Х			i Karan	*DOCC		
	d)	Information on when the unit was operated?	Х				DOCC		
	e)	Specification of all wastes that have been managed at the unit, to the extent available?	Х				DOCC		
(2)	рег	s the facility submitted all available information taining to any release of hazardous wastes or cardous constituents from any waste management ts?	Х				DOCC		
(3)	folio con a m	s the facility provided results of sampling of any of the owing where the director ascertains it is necessary to inplete a RCRA facility assessment that will determine it in ore complete investigation is necessary?	> '			``			
	a)	Ground water?	X				DOCC		
	b)	Land surface?	X				DOCC		
	c)	Subsurface strata?	X				DOCC		
	d)	Surface water?	Х				DOCC		
	e)	Air?	Х				DOCC		

Note: The questions related to the following sections are related to information the permit writer needs to ascertain to complete the permit conditions. In addition, if US EPA is regulating the corrective action process the permit writer must determine what phase corrective actions is in and at what point Ohio EPA will take over the corrective actions.

\*DESCRIPTION OF CURRENT CONDITIONS

QUADRANT I DOCC SEPT 1990 QUADRANT II DOCC DEC 1990 QUADRANT III DOCC NOV 1991 QUADRANT IV DOCC DEC 1992 Part B Review Checklist - Section J Facility - <u>OH7890008983</u> Page 3

					, j	· · · · · · · · · · · · · · · · · · ·	
		YES	NO	NA	Page #	Notes - NOD Comment#	Include on Inspection Checklist?
Con	dition E.3 Identification of SWMUs (OAC 3745-54-101)						
(1)	Does the facility or the US EPA RFA have a complete list of SWMUs?	Х				DOCC	
(2)	Does the facility or US EPA RFA identify releases of hazardous waste or hazardous constituents?	х		·		( <b>DOC</b> C	
(3)	Does the facility or US EPA RFA identify potential releases of hazardous waste or hazardous constituents?	х			か <b>含</b> き、	DOCC	
(4)	Does the facility or US EPA RFA (PA/VSI or PR/VSI) identify media of concern?	X	*:	· · · · · · · · · · · · · · · · · · ·		DOCC	
Con	dition E.4 No Corrective Action Required At This Time						
(1)	Were no known or potential releases of hazardous waste or hazardous waste constituents associated with identified waste management units? A yes answer indicates that condition E.4 may be applicated.		X				
(2)	Has the facility performed an RFI of 1s required to perform an RFI? A yes answer indicates that condition E.4 is not applicable.	X.					
Con	dition E.5 RCRA Facility Investigation (RFI)						
(1)	Has the facility submitted an RFI workplan? If yes indicate the date of the approved RFI workplan in section A of condition E.5. If no, include section A as written in the permit with the appropriate modifications of the language.	х				QUADRANT I RFI WORK PLAN SEPT 1990 QUADRANT II RFI WORK PLAN DEC 1990 QUADRANT III RFI WORK PLAN NOV 1991 QUADRANT IV RFI WORK PLAN DEC 1992	
(2)	Has the facility implemented the RFI workplan? If yes, indicate the date of implementation in section B of condition E.5. If no, include section B as written in the permit with the appropriate modifications of the language.	х				SEE ABOVE	

		YES	NO	NA	Page #	Notes - NOD Comment#	include on inspection Checklist?
(3)	Has the facility submitted an RFI final report? If yes, indicate the date of the approved RFI final report in section C of condition E.5. If no, include section C as written in the permit with the appropriate modifications of the language.	х		***		QUADRANT I RFI FINAL REPORT SEPT 199 QUADRANT II RFI FINAL REPORT SEPT 19 QUADRANT III RFI FINAL REPORT DEC 19 QUADRANT IV RFI FINAL REPORT DEC 199	96 96
Con	dition E.6 Interim Measure (IM)						
(1)	Has the facility completed any interim measures? If yes, Condition E.6 should reference the work that has been done to date. If no, go to the next question.	Х	**************************************		\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	X-749 GROUNDWATER CONTAINMENT WALL I PETER KIEWIT (PK)/X749B LANDFILL IRM X-701B INTERCEPTOR TRENCHES IRM	
(2)	Is the facility preparing or in the process of conducting interim measures? If yes, the details and requirements should be incorporated into Condition E6.	X				WELL 6B IRM X-701B IRM	
Con	dition E.7 Determination of No Further Action						
(1)	Has the facility submitted a class 3 permit modification request to terminate the Corrective Action tasks of the Schedule of Compliance?	,	X				
(2)	Has Ohio EPA terminated the Conective Action tasks of the Schedule of Compliance based on the results of the completed RFI and other relevant information? If yes, then include information on the termination in section A of condition E.7. If no, include section A as written in the permit with the appropriate modifications of the language. Sections B and C should be included as written.	,	х				
(3)	Does the facility state that even if no further action has been warranted by Ohio EPA, they will continue to monitor air, soil, and water and perform further investigations at Ohio EPA's request should new information and/or circumstances warrant it.			х			

Part B Review Checklist - Section J Facility - <u>OH7890008983</u> Page 5

, ,	· · · · · · · · · · · · · · · · · · ·	YES	NO	NA	Page #	Notes - NOD Comment #	Include on Inspection Checklist?
(1)	Has the facility completed a CMS workplan? If yes, indicate the date of the approved CMS workplan in section A of condition E.8. If no, include section A as written in the permit with the appropriate modifications of the language.	х		Ć.		QUADRANT I CMS WORK PLAN SEPT 1993 QUADRANT II CMS WORK PLAN SEPT 1993 QUADRANT III CMS WORK PLAN JAN 1995 QUADRANT IV CMS WORK PLAN NOV 1993	
(2)	Has the facility implemented the CMS workplan? If yes, indicate the date of implementation in section B of condition E.8. If no, include section B as written in the permit with the appropriate modifications of the language.	х	Žiet		Alongolf Marie	SEE ABOVE	
(3)	Has the facility completed the CMS final report? If yes, indicate the date of the approved CMS final report in section C of condition E.8. If no, include section C as written in the permit with the appropriate modifications of the language.		X			©WADRANT I CMS FINAL REPORT MAY 2000  QUADRANT II CMS FINAL REPORT FEB 2001  QUADRANT III CMS FINAL REPORT APR 1998  QUADRANT IV CMS FINAL REPORT AUG 1998  * A CMS final report for the entire  facility has not been completed	
Con	dition E.9 Corrective Measures Implementation (CMI) dition E.10 Newly Identified SWMUs or Releases dition E.11 Corrective Action for Newly Identified SWMUs Releases		_				
	se conditions are to be incorporat <b>ed into the</b> permit (with opriate modifications).	23.9					



## RCRA Part B Review Checklist Administrative Section Renewals

#### PART B REVIEW CHECKLIST

#### **ADMINISTRATIVE SECTION - RENEWALS**

Facility/ID #	OH7890008983	Date	07/29/2010
Reviewer		DO	

#### Relevant Guidance Documents - None

	YES	NO	NA	Page #	Notes - NOD Comment #
Renewal Applications					
Submittal of Hazardous Waste Permit Applications OAC 3745-50-40 (D)					
Has the facility submitted the renewal application at least one hundred eighty days before the expiration date of the effective permit?	х		i		
If the application was not submitted one hundred eighty days before the expiration date of the effective permit, did the permittee receive authorization from the director for a later date? The director shall not authorize applications to be submitted later than the expiration date of the existing permit.			Х		
Does the Part B application contain any proposed facility changes or alterations which are classified as Class 1, Class 2, Class 3 modifications? If yes, these modifications must be processed in accordance with OAC 3745-50-51.		х			
Continuation of Expiring Permits OAC 3745-50-56					
A facility operating pursuant to a hazardous waste permit that has expired may continue to operate in accordance with the terms and conditions of the expired permit until the renewal permit is issued or denied if the following two conditions are met:			:		

	YES	NO	NA	Page #	Notes - NOD Comment #
(1) Has the permittee submitted a timely and complete application for renewal under rule 3745-50-40 (see above) of the Administrative Code?	х				
(2) Has a new permit not been issued, through no fault of the permittee, pursuant to rule 3745-50-40 of the Administrative Code on or before the expiration date of the previous permit?			х		
Required Exposure Information for Landfills OAC 3745-50-40 (E)					
Is the Part B permit application accompanied by information, reasonably ascertainable by the owner or operator, on the potential for the public to be exposed to hazardous wastes or hazardous constituents resulting from a release from the unit?			х		
Does this information address:					
(1) Reasonably foreseeable potential releases from either normal operations or accidents at the unit, including releases associated with the transportation to or from the unit?			х		
(2) The potential pathways of human exposure to hazardous wastes or hazardous constituents resulting from releases as described above?			х		
(3) The potential nature and magnitude of the human exposure from such releases?			х		+